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U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIF.  
LOS ANGELES

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2016 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE LANDA-RODRIGUEZ,  
aka "Jose Rodriguez-Landa,"  
aka "Jose Landa,"  
aka "Jose Rodriguez,"  
aka "Fox,"  
aka "Fox Tapia,"  
aka "F-X,"  
aka "Alejandro Tapia,"  
aka "Cola Rojo,"  
aka "Red Tail,"  
aka "Pops,"  
aka "Tio,"  
aka "The General,"  
aka "Taras,"  
aka "The Old Man,"  
aka "The Animal,"  
aka "Old School,"  
LUIS VEGA,  
aka "Little One,"  
aka "L-1,"  
aka "Tito,"  
GABRIEL ZENDEJAS-CHAVEZ,  
aka "Corbatas,"  
RAFAEL LEMUS,  
aka "Ere,"  
aka "The Voice,"  
aka "La Voz,"  
LUIS GARCIA,  
aka "Hefty,"

CR No. 18-  
**18CR00173-2**  
I N D I C T M E N T

[18 U.S.C. § 1962(d): Racketeer Influenced and Corrupt Organizations Conspiracy; 18 U.S.C. §§ 1959(a)(1), (3), (5), (6): Violent Crimes in Aid of Racketeering Activity; 21 U.S.C. § 846: Conspiracy to Distribute and Possess With Intent to Distribute Controlled Substances; 21 U.S.C. §§ 841(a)(1), (b)(1)(A), (b)(1)(B), (b)(1)(C), (b)(1)(D): Possession with Intent to Distribute Controlled Substances; 18 U.S.C. § 1956(a)(1)(A)(i): Money Laundering; 18 U.S.C. § 1029(a)(3): Possession of at Least Fifteen Access Devices; 18 U.S.C. § 1028A(a)(1): Aggravated Identity Theft; 18 U.S.C. § 924(c)(1)(A): Possession, Use, and Carrying of a Firearm During and in Relation to, and in Furtherance of, a Crime of Violence and/or a Drug Trafficking Crime; 18 U.S.C. § 922(g)(1): Felon in Possession of Firearms and Ammunition; 18 U.S.C. § 2: Aiding and Abetting and Causing an Act to Be Done; 18 U.S.C. § 1963; 21 U.S.C. § 853; 18 U.S.C. § 924(d): Criminal Forfeiture]

1     aka "Grimm,"  
2     aka "H,"  
3     ALVINO MUNOZ,  
4     aka "Bino,"  
5     aka "B,"  
6     DANIEL CERVANTES,  
7     aka "Maniac,"  
8     aka "J,"  
9     aka "Paisa Jose,"  
10    MIGUEL CALDERON,  
11    aka "Big Speedy,"  
12    aka "Mickey,"  
13    ERNESTO VARGAS,  
14    aka "Huero,"  
15    aka "Huero Caballero,"  
16    aka "Paisa Huero,"  
17    MIGUEL RODRIGUEZ,  
18    aka "Rebel,"  
19    aka "Pee Wee,"  
20    aka "R,"  
21    GILBERT PARRA,  
22    aka "Droopy,"  
23    aka "Chavo,"  
24    GERARDO TAPIA,  
25    aka "Jerry,"  
26    DONATO GONZALES,  
27    aka "Nato,"  
28    aka "Nasty,"  
29    aka "Debo,"  
30    aka "Ray,"  
31    MIGUEL GARCIA,  
32    aka "Toro,"  
33    aka "Hulk,"  
34    aka "T,"  
35    aka "Horns,"  
36    HECTOR DUARTE,  
37    aka "Lil Man,"  
38    aka "Hecko,"  
39    SAMANTHA RIVERA,  
40    aka "Sam,"  
41    aka "S,"  
42    MARK LANDEROS,  
43    aka "Smokey,"  
44    aka "Troy,"  
45    aka "Hot,"  
46    JONATHAN VERDEJA,  
47    aka "Hardcore,"  
48    aka "Duke,"  
49    CECILIA VIRGEN,  
50    aka "Cecilia DeLeon,"  
51    aka "Sessy,"  
52    aka "Hazel,"  
53    aka "Gia,"  
54    aka "Sky,"  
55    aka "Hooker,"

1 LAUREEN GARCIA,  
aka "L,"  
2 NANCY DUARTE,  
aka "Pink,"  
3 VALERIE TREJO,  
aka "Val,"  
4 GENESSIS BLANCO,  
aka "Pink,"  
5 KELLY JO BELL,  
JOSE FLORES,  
6 aka "Silent,"  
aka "Lo,"  
7 MARK LEVY,  
aka "Cloudy,"  
8 aka "C3,"  
VALENTIN CORDOVA,  
9 aka "Teen,"  
FRANKIE MEGORADO,  
10 aka "Frankie Mejorado,"  
aka "Slick,"  
11 aka "Junior,"  
aka "Speedy,"  
12 JOSE OLEA,  
aka "Sniper,"  
13 MANUEL JIMENEZ,  
aka "Porky,"  
14 ALAVARO LEYVA,  
aka "Flaco,"  
15 aka "Trigger,"  
CHRIS FERREIRA,  
16 aka "Caveman,"  
DAVID BERNARDINO,  
17 aka "Downer,"  
ANDREW PINEDA,  
18 aka "Mighty,"  
aka "Shy Boy,"  
19 ALONDRA GOMEZ,  
MIRIAM MEZA,  
20 ANA MARTINEZ,  
aka "Ana America,"  
21 aka "Bandit,"  
ALVARO RUIZ,  
22 aka "Roach,"  
ADRIAN ARAIZA,  
23 aka "Chemo,"  
GAIL PONCE,  
24 aka "Bashful,"  
DIANA MARTINEZ,  
25 aka "Devine,"  
MARLON CORNEJO,  
26 aka "Maniac,"  
ANGEL SANCHEZ,  
27 aka "Lil Triste,"  
JUAN REYES,  
28 aka "Cosmo,"

1 RICHARD BAILEY,  
aka "Spooks,"  
2 aka "Nigger Richard,"  
aka "Half and Half,"  
3 MICHAEL BENNETT,  
aka "Irish,"  
4 EDWIN AYALA,  
aka "Happy,"  
5 DAVID VILLALOBOS,  
aka "Grumpy,"  
6 DAVID DIAZ,  
aka "Stomps,"  
7 ROBERT RAMIREZ,  
aka "Wiz,"  
8 KRISTEN AYALA,  
RICHARD GRIEGO,  
9 aka "Twisted,"  
aka "Pretzel,"  
10 JUAN LEONARD GARCIA,  
aka "Little John,"  
11 aka "Trevor,"  
MARK MARTINEZ,  
12 aka "Brat,"  
AMO WEST,  
13 aka "Chico,"  
RAMIRO ANDRADE,  
14 aka "Scrappy,"  
OSWALDO QUINTERO,  
15 aka "Sporty,"  
NICHOLAS ESCARCEGA,  
16 aka "Tweeks,"  
CHRISTIAN FUENTES,  
17 aka "Nino,"  
FRANCISCO RUIZ,  
18 aka "Pancho,"  
aka "Scooby,"  
19 JOSE VERA,  
aka "Sapo,"  
20 JONATHAN RODRIGUEZ,  
aka "Sharkie,"  
21 BRYANNA MCCULLAH,  
aka "Bee Bee,"  
22 JUAN NMN GARCIA,  
aka "Trouble,"  
23 JONATHAN MENDEZ,  
aka "Casper,"  
24 aka "Smokes,"  
MARTIN SALAZAR,  
25 aka "Sweeper,"  
RAMON AMAYA,  
26 aka "Lil Happy,"  
FRANK HERRERA,  
27 aka "Dopey,"  
aka "Ben,"  
28

1 ALEJANDRO MARTINEZ,  
2 aka "Smokey," and  
3 MARCO MEZA,  
4 aka "Green Eyes,"  
5 aka "Ojos,"

6 Defendants.

7  
8 The Grand Jury charges:

9 GENERAL ALLEGATIONS

10 A. HISTORY AND STRUCTURE OF THE MEXICAN MAFIA

11 1. The Mexican Mafia, also known as "La Eme," is a "gang of  
12 gangs" comprised mostly of senior members of southern California  
13 Hispanic street gangs who have come together to control and profit  
14 from the activities of Hispanic gangs operating in southern  
15 California. La Eme was established in the 1950s by Hispanic youth  
16 inmates at the Duell Vocational Facility, but over the decades has  
17 morphed into an international criminal organization. Today, there  
18 are approximately 140 full members of the Mexican Mafia, referred to  
19 as "carnales" or "brothers." The majority of Mexican Mafia members  
20 are incarcerated in California prisons or jails or in federal  
21 prisons. By exercising control over inmates in the prison and jail  
22 systems, primarily through violence and threats of violence, the  
23 Mexican Mafia is able to control the activities of southern  
24 California Hispanic criminal street gangs, both inside and outside  
25 custody facilities. Mexican Mafia members and associates wield such  
26 power over the prison and jail populations that they are able to  
27 order that acts of violence be carried out not only against other  
28 prison or jail inmates, but also against street gang members and  
others outside of prison or jail.

1           2.   Members of the Mexican Mafia have divided control of, and  
2 the rights to criminal proceeds from, nearly all penal facilities in  
3 California, including state prison and county jail systems.  
4 Similarly, members of the Mexican Mafia have divided the rights to  
5 criminal proceeds from the activities of southern California Hispanic  
6 criminal street gangs in various southern California neighborhoods.

7           3.   Generally, one member of the Mexican Mafia has control of  
8 and rights to a specific facility. That member, whether incarcerated  
9 in that facility or not, will control the smuggling of drugs into the  
10 facility, the collection of taxes from the sale of those drugs,  
11 extortion within that facility (including the kitty and other fines  
12 discussed below), and the maintenance of discipline within the  
13 facility. In some cases, different members of the Mexican Mafia may  
14 control different parts of the same facility.

15           4.   Similarly, members of the Mexican Mafia have divided  
16 control of and the rights to "taxes," or a share of criminal proceeds  
17 from criminal activities including drug trafficking, from nearly all  
18 Hispanic gangs in southern California. Generally, one member of the  
19 Mexican Mafia has control of and rights to a specific area; that  
20 Mexican Mafia member will control the sale of drugs within that area,  
21 the collection of taxes from that area, and the maintenance of  
22 discipline over gang members from that area.

23           5.   The division of control of custody facilities and  
24 neighborhoods is generally agreed upon by the members of the Mexican  
25 Mafia, although there are occasionally disputes among members as to  
26 the division. Once a Mexican Mafia member acquires control of a  
27 custody facility or neighborhood, he can generally operate that  
28 custody facility or neighborhood without interference from other

1 members. The Mexican Mafia member in control of a custody facility  
2 or neighborhood will put together a team of trusted associates to  
3 control the custody facility or neighborhood.

4 6. The Mexican Mafia is split into two major subgroups,  
5 "State" and "Federal." A State Mexican Mafia member can control  
6 state prisons, southern California jails, and southern California  
7 neighborhoods, but generally not federal facilities. A Federal  
8 Mexican Mafia member can control federal facilities anywhere in the  
9 country, and southern California neighborhoods, but usually cannot  
10 control a state prison or a county jail.

11 7. To become a Mexican Mafia member, a Hispanic gang member  
12 generally must have a distinguished reputation for "putting in work"  
13 on behalf of the Mexican Mafia, meaning the gang member has murdered  
14 or assaulted enemies and rivals of Mexican Mafia members.  
15 Prospective members are also expected to have provided financial  
16 assistance to Mexican Mafia members, and to have followed the Mexican  
17 Mafia rules that govern the streets or correctional institutions.

18 8. Mexican Mafia members carry out their criminal activity  
19 with the help of associates. Some of these trusted associates act as  
20 "shot-callers," that is, high-level associates who have been given  
21 the authority to conduct affairs of the Mexican Mafia, such as  
22 collecting extortion and drug money and enforcing discipline in their  
23 particular areas of control. A "facilitator" is the highest level  
24 shot-caller and works directly under the authority of the Mexican  
25 Mafia member who appointed him. The facilitator coordinates the  
26 activities of the other shot-callers and is responsible for ensuring  
27 that other shot-callers carry out the Mexican Mafia member's orders

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1 in their area of responsibility, whether in a neighborhood or a  
2 custody facility.

3 9. Members of Hispanic street gangs in southern California are  
4 referred to as "Surenos" and fall under the control of the Mexican  
5 Mafia. "Surenos" may also be referred to as "Southsiders."

6 Additionally, the Mexican Mafia considers Mexican nationals, referred  
7 to as "Paisas," and Hispanic-American citizens who are not members of  
8 a gang, generally referred to as "Residents," to fall under the  
9 Mexican Mafia's control while in a custody facility, and trusted  
10 Residents and Paisas may participate in or be given shot-caller  
11 positions in Mexican Mafia affairs.

12 10. Members and associates of street gangs controlled by and/or  
13 affiliated with the Mexican Mafia must pay "taxes" to members and  
14 associates of the Mexican Mafia for permission to maintain control  
15 over their territories in order to distribute drugs and engage in  
16 other criminal activity. This system of "taxation" amounts to  
17 widespread extortion. These "taxes" also ensure the protection of  
18 the gang's members once they enter prisons or jails. The "taxing"  
19 and control applies to activities both in and out of jail or prison.  
20 Indeed, a jail or prison, or a floor, yard, or other unit of a jail  
21 or prison is considered by the Mexican Mafia to be territory just as  
22 much as a neighborhood.

23 11. Surenos, whether in a custody facility or in a  
24 neighborhood, operate as soldiers or workers for the Mexican Mafia.  
25 Indeed, being loyal to the Mexican Mafia is an integral part of being  
26 a southern California Hispanic street gang member, and it is openly  
27 understood that when individuals join such gangs that they are  
28 joining an entity loyal to the Mexican Mafia. Members of such gangs



1 are expected to, and are proud to, carry out the orders of the  
2 Mexican Mafia member in control of their neighborhood or custody  
3 facility, because doing work for the Mexican Mafia increases the gang  
4 member's status and reputation. Some gangs proudly include in their  
5 name the number "13," denoting the letter M, or "eme" in Spanish, in  
6 order to demonstrate the gang's loyalty and allegiance to the Mexican  
7 Mafia.

8 B. THE MEXICAN MAFIA'S ORGANIZATION WITHIN THE LOS ANGELES COUNTY  
9 JAIL SYSTEM

10 12. The Los Angeles County Jail System ("LACJ" or "the System")  
11 is operated by the Los Angeles County Sheriff's Department ("LASD")  
12 and receives moneys from the United States Department of Homeland  
13 Security and other federal agencies. The system includes various  
14 men's facilities including Men's Central Jail ("MCJ"), the Twin  
15 Towers Correctional Facility ("Twin Towers"), the Inmate Reception  
16 Center ("IRC"), the North County Correctional Facility ("NCCF"),  
17 Pitchess Detention Center-North Facility ("Pitchess North"), Pitchess  
18 Detention Center-East Facility ("Pitchess East"), and Pitchess  
19 Detention Center-South Facility ("Pitchess South"). On any given  
20 day, the System houses approximately 15,000 inmates.

21 13. At any time, one Mexican Mafia member may exercise control  
22 over the entire LACJ system, or control of various facilities within  
23 the System may be divided among different members of the Mexican  
24 Mafia. The Mexican Mafia member in charge of an LACJ custody  
25 facility maintains control over the facility with the assistance of  
26 trusted shot-callers, facilitators, and associates. These Mexican  
27 Mafia members and associates, working together to control criminal  
28 activity within LACJ, have become their own entity or enterprise and

1 effectively function as an illegal government within LACJ custody  
2 facilities ("the Mexican Mafia LACJ Enterprise").  
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## COUNT ONE

[18 U.S.C. § 1962(d)]

1. Paragraphs 1 through 13 of the General Allegations are re-alleged and incorporated by reference as if fully set forth herein.

A. THE RACKETEERING ENTERPRISE

2. At all times relevant to this Indictment, defendants JOSE LANDA-RODRIGUEZ, also known as ("aka") "Jose Rodriguez-Landa," aka "Jose Landa," aka "Jose Rodriguez," aka "Fox," aka "Fox Tapia," aka "F-X," aka "Alejandro Tapia," aka "Cola Rojo," aka "Red Tail," aka "Pops," aka "Tio," aka "The General," aka "Taras," aka "The Old Man," aka "The Animal," aka "Old School" ("JOSE LANDA-RODRIGUEZ"), LUIS VEGA, aka "Little One," aka "L-1," aka "Tito" ("LUIS VEGA"), GABRIEL ZENDEJAS-CHAVEZ, aka "Corbatas" ("GABRIEL ZENDEJAS-CHAVEZ"), RAFAEL LEMUS, aka "Ere," aka "The Voice," aka "La Voz" ("RAFAEL LEMUS"), LUIS GARCIA, aka "Hefty," aka "Grimm," aka "H" ("LUIS GARCIA"), ALVINO MUNOZ, aka "Bino," aka "B" ("ALVINO MUNOZ"), DANIEL CERVANTES, aka "Maniac," aka "J," aka "Paisa Jose" ("DANIEL CERVANTES"), MIGUEL CALDERON, aka "Big Speedy," aka "Mickey" ("MIGUEL CALDERON"), ERNESTO VARGAS, aka "Huero" aka "Huero Caballero," aka "Paisa Huero" ("ERNESTO VARGAS"), MIGUEL RODRIGUEZ, aka "Rebel," aka "Pee Wee," aka "R" ("MIGUEL RODRIGUEZ"), GILBERT PARRA, aka "Droopy," aka "Chavo" ("GILBERT PARRA"), GERARDO TAPIA, aka "Jerry" ("GERARDO TAPIA"), DONATO GONZALES, aka "Nato," aka "Nasty," aka "Debo," aka "Ray" ("DONATO GONZALES"), MIGUEL GARCIA, aka "Toro," aka "Hulk," aka "T," aka "Horns" ("MIGUEL GARCIA"), HECTOR DUARTE, aka "Lil Man," aka "Hecko" ("HECTOR DUARTE"), SAMANTHA RIVERA, aka "Sam," aka "S" ("SAMANTHA RIVERA"), MARK LANDEROS, aka "Smokey," aka "Troy," aka "Hot" ("MARK LANDEROS"), JONATHAN VERDEJA, "Hardcore," aka "Duke"

("JONATHAN VERDEJA"), CECILIA VIRGEN, aka "Cecilia DeLeon," aka  
 "Sessy," aka "Hazel," aka "Gia," aka "Sky," aka "Hooker" ("CECILIA  
 VIRGEN"), LAUREEN GARCIA, aka "L" ("LAUREEN GARCIA"), NANCY DUARTE,  
 aka "Pink" ("NANCY DUARTE"), VALERIE TREJO, aka "Val" ("VALERIE  
 TREJO"), GENEISSIS BLANCO, aka "Pink" ("GENEISSIS BLANCO"), KELLY JO  
 BELL ("KELLY JO BELL"), JOSE FLORES, aka "Silent," aka "Lo" ("JOSE  
 FLORES"), MARK LEVY, aka "Cloudy," aka "C3" ("MARK LEVY"), VALENTIN  
 CORDOVA, aka "Teen" ("VALENTIN CORDOVA"), FRANKIE MEGORADO, aka  
 "Frankie Mejorado," aka "Slick," aka "Junior," aka "Speedy" ("FRANKIE  
 MEGORADO"), JOSE OLEA, aka "Sniper" ("JOSE OLEA"), MANUEL JIMENEZ,  
 aka "Porky" ("MANUEL JIMENEZ"), ALAVARO LEYVA, aka "Flaco," aka  
 "Trigger" ("ALAVARO LEYVA"), CHRIS FERREIRA, aka "Caveman" ("CHRIS  
 FERREIRA"), DAVID BERNARDINO, aka "Downer" ("DAVID BERNARDINO"),  
 ANDREW PINEDA, aka "Mighty," aka "Shy Boy" ("ANDREW PINEDA"), ALONDRA  
 GOMEZ ("ALONDRA GOMEZ"), MIRIAM MEZA ("MIRIAM MEZA"), ANA MARTINEZ,  
 aka "Ana America," aka "Bandit" ("ANA MARTINEZ"), ALVARO RUIZ, aka  
 "Roach" ("ALVARO RUIZ"), ADRIAN ARAIZA, aka "Chemo" ("ADRIAN  
 ARAIZA"), GAIL PONCE, aka "Bashful" ("GAIL PONCE"), DIANA MARTINEZ,  
 aka "Devine" ("DIANA MARTINEZ"), MARLON CORNEJO, aka "Maniac"  
 ("MARLON CORNEJO"), ANGEL SANCHEZ, aka "Lil Triste" ("ANGEL  
 SANCHEZ"), JUAN REYES, aka "Cosmo" ("JUAN REYES"), RICHARD BAILEY,  
 aka "Spooks," aka "Nigger Richard," aka "Half and Half" ("RICHARD  
 BAILEY"), MICHAEL BENNETT, aka "Irish" ("MICHAEL BENNETT"), EDWIN  
 AYALA, aka "Happy" ("EDWIN AYALA"), DAVID VILLALOBOS, aka "Grumpy"  
 ("DAVID VILLALOBOS"), and DAVID DIAZ, aka "Stomps" ("DAVID DIAZ"),  
 and others known and unknown to the Grand Jury, were members and  
 associates of an organization engaged in, among other things, acts  
 involving murder, kidnapping, robbery, extortion, trafficking in

1 controlled substances, witness tampering, money laundering, and  
2 identity theft. At all relevant times, this organization,  
3 hereinafter the "Mexican Mafia LACJ Enterprise," operated within the  
4 Central District of California and elsewhere. The Mexican Mafia LACJ  
5 Enterprise, including its leaders, members, and associates,  
6 constitute an "enterprise," as defined by Title 18, United States  
7 Code, Section 1961(4), that is, a group of individuals associated in  
8 fact, although not a legal entity, which is engaged in, and the  
9 activities of which affect, interstate and foreign commerce. The  
10 Mexican Mafia LACJ Enterprise constitutes an ongoing organization  
11 whose members function as a continuing unit for a common purpose of  
12 achieving the objectives of the enterprise.

13 3. The Mexican Mafia LACJ Enterprise operates for the benefit  
14 of the Mexican Mafia member or members deemed by the Mexican Mafia to  
15 be in control of LACJ. The Mexican Mafia LACJ Enterprise conducts  
16 its activities within LACJ facilities and in some surrounding  
17 neighborhoods by imposing the rules of the Mexican Mafia on inmates  
18 within LACJ facilities and on members of predominantly Hispanic  
19 street gangs. Using the methods of the Mexican Mafia, the Mexican  
20 Mafia LACJ Enterprise carries out its goals of controlling drug  
21 trafficking activities and the distribution of drug trafficking  
22 proceeds, extortion, and the enforcement of Mexican Mafia rules both  
23 inside and outside LACJ facilities.

24 4. The Mexican Mafia LACJ Enterprise operates to carry out the  
25 goals and objectives of the Mexican Mafia within LACJ custody  
26 facilities and in some surrounding neighborhoods, including by  
27 directing and controlling drug trafficking activities and the  
28 distribution of drug trafficking proceeds, extortion, as well as the

1 enforcement of Mexican Mafia rules (which are used as a basis for  
2 extortion), both inside and outside the LACJ custody facilities.  
3 More specifically:

4           a.    The Mexican Mafia LACJ Enterprise keeps track of  
5 southern California Hispanic gang members through lists known as  
6 "roll calls," made to keep track of every Sureno in a particular  
7 module or dorm, often including the inmate's name, booking number,  
8 next court date, gang, and/or moniker. This enables the Mexican  
9 Mafia LACJ Enterprise to track down persons in bad standing, to  
10 coordinate the movement of drugs and kites, to account for kitty  
11 revenue, and other enterprise business.

12           b.    Mexican Mafia LACJ Enterprise members and associates  
13 in prisons or jails send instructions to local street gangs and other  
14 Mexican Mafia members and associates, both inside and outside prison  
15 and jail, via telephone calls, prison system e-mails, letters,  
16 "kites" (which are notes smuggled by prisoners), "verbals" (passing a  
17 particularly sensitive message verbally from inmate to inmate), and  
18 by conveying messages through jail or prison visitors. Mexican Mafia  
19 LACJ Enterprise members and associates generally use coded language  
20 in order to conceal the true nature of their discussions with and  
21 instructions to criminal associates. In order to pass on  
22 instructions and information from prison and jail, Mexican Mafia LACJ  
23 Enterprise members and associates generally rely on associates, often  
24 female, known as "secretaries," who communicate with incarcerated  
25 Mexican Mafia members and associates and relay their instructions to  
26 others. In addition, attorneys who are willing to assist in the  
27 Mexican Mafia's criminal activities are utilized by the Mexican Mafia  
28 LACJ Enterprise to pass messages concerning these activities and to

1 facilitate communication among its members and associates. These  
2 attorneys are particularly valued by members of the Mexican Mafia  
3 LACJ Enterprise because they provide a means to shield criminal  
4 communications from law enforcement by providing the appearance of  
5 attorney-client privilege and a veneer of legitimacy to their  
6 criminal communications. Both secretaries and attorneys are treated  
7 as respected criminal figures by members of street gangs controlled  
8 by and/or affiliated with the Mexican Mafia LACJ Enterprise.

9 c. Another method of communication employed by the  
10 Mexican Mafia LACJ Enterprise is telephone calls made with "burnout"  
11 phones. Burnout phones are phones that use landline service opened  
12 with stolen identities. The Mexican Mafia LACJ Enterprise uses  
13 burnout phones to make collect calls from prisons and jails to  
14 associates on the outside until the telephone company realizes the  
15 account is fraudulent and shuts the line off.

16 d. The Mexican Mafia LACJ Enterprise commonly extorts  
17 money from gang members and associates who violate enterprise rules  
18 and from those who want to engage in profitable activities in areas  
19 controlled by the Mexican Mafia LACJ Enterprise. If the gang member  
20 or associate does not pay the demanded sum, or has violated Mexican  
21 Mafia or enterprise rules, a Mexican Mafia leader commonly will order  
22 that the person be assaulted until that individual complies.  
23 Alternatively, if the non-compliant individual refuses to pay, or if  
24 the enterprise is not able to punish the individual, the Mexican  
25 Mafia LACJ Enterprise may extort or punish family members, close  
26 associates, members of that person's gang, or others related to the  
27 person. If a person or gang does not meet the Mexican Mafia LACJ

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1 Enterprise's payment demands, they will be subjected to violence  
2 until they comply.

3 e. One of the Mexican Mafia LACJ Enterprise's most  
4 effective ways of extorting or taxing gang members and other Hispanic  
5 inmates in jail or prison is through the "kitty." Once a week, in  
6 every module of the Los Angeles County Jail system, inmates are  
7 allowed to purchase items from the LASD-operated store or commissary.  
8 These items include candy bars, soup, ramen noodles, shower shoes,  
9 deodorant, baby powder, and other food and personal hygiene items.  
10 In every jail module controlled by the Mexican Mafia LACJ Enterprise,  
11 every Hispanic gang member, Paisa, or Resident is required to  
12 contribute commissary items of a certain value (e.g., one dollar's  
13 worth of items) into the kitty for every set amount of items  
14 purchased (e.g., fifteen dollars' worth). The Mexican Mafia member  
15 in control of the module sets the contribution rates for the kitty,  
16 and the module shot-caller collects the commissary items and sells  
17 them to a person in the module for a price that is also set by the  
18 Mexican Mafia member. The payment for the kitty is made to a  
19 secretary or facilitator outside of the facility, who forwards it to  
20 the Mexican Mafia member who controls that facility.

21 f. The Mexican Mafia LACJ Enterprise also makes money by  
22 controlling the sales of drugs. On the streets, profiting from drug  
23 trafficking takes the form of "taxing" drug dealers. All drug  
24 dealers in an area controlled by the Mexican Mafia LACJ Enterprise  
25 must pay a percentage of their profits from the sale of drugs to the  
26 enterprise. If the drug dealer does not pay, he will not be allowed  
27 to sell drugs in that area, under threat of assault or even death.  
28 If the drug dealer does pay the tax, the drug dealer benefits by



1 receiving protection from other dealers or robbers and gains  
2 assistance in collecting debts.

3 g. Inside of custody facilities, the taxing of drug  
4 trafficking takes two forms. First, Mexican Mafia members, shot-  
5 callers, and associates will arrange for drugs to be smuggled to them  
6 inside the Los Angeles County Jail System. Once the Mexican Mafia  
7 member or his trusted shot-caller or facilitator within a facility  
8 receives the drugs, he will direct their sale within the Los Angeles  
9 County Jail system with the proceeds benefiting the member in control  
10 of that facility. Furthermore, others within the facility will not  
11 be allowed to sell their own drugs until the Mexican Mafia member's  
12 drugs have been sold. Second, the Mexican Mafia's control of drug  
13 trafficking is maintained by collecting a "thirds" tax on all other  
14 drugs that are smuggled into the Los Angeles County Jail system.  
15 Pursuant to the thirds tax, one third of each shipment of drugs that  
16 is smuggled into the Los Angeles County Jail system must be "broken-  
17 off" and given to the Mexican Mafia member in control of the facility  
18 or his trusted shot-caller or facilitator. If the Mexican Mafia  
19 member decides to sell the "thirds-tax" portion of the drugs, they  
20 are sent to a dorm or module for sale with the proceeds going to the  
21 Mexican Mafia member, and others in the facility are not allowed to  
22 sell drugs until the Mexican Mafia member's thirds have been sold.

23 h. The Mexican Mafia LACJ Enterprise does not limit its  
24 extortion to the sale of drugs and the operation of the kitty. The  
25 enterprise may subject any person or inmate in a Mexican Mafia LACJ  
26 Enterprise controlled neighborhood, facility, or module to extortion  
27 for any money-generating activity he or she engages in while in the  
28 enterprise controlled territory.

i. The Mexican Mafia LACJ Enterprise has self-imposed rules handed down by the Mexican Mafia. These rules, referred to as "reglas," are imposed to maintain fear and compliance among Sureños. Because these rules provide a basis for being fined as well as assaulted, they are a key part of the Mexican Mafia LACJ Enterprise's extortion scheme. If a southern California Hispanic gang member should break one of these rules, discipline is imposed by a facilitator, shot-caller, or secretary of the Mexican Mafia member in control of the facility. Such discipline is frequently imposed in the form of a fine or an assault. Assaults are often referred to as "13 Seconds," "26 Seconds," or "39 Seconds." The premise underlying these punishments is that a person who breaks an enterprise rule should be punished by beatings for either 13 seconds, or for a multiple of 13 seconds. Thirteen seconds is a less severe form of punishment that usually involves two individuals assaulting the offender for thirteen seconds. Thirty-nine seconds is a more severe form of punishment that involves three (or in some cases more) individuals assaulting the offender for 39. Thirty-nine seconds can have different variations. For example, thirty-nine seconds could be issued in the form of three 13-second assaults on the same day (sometimes referred to as "breakfast, lunch, and dinner") or it could be one 39-second assault. A 39-second punishment where three individuals assault an offender for 39 consecutive seconds is also commonly referred to as a "smash out" because the offender is usually moved out of the area after the assault for his own safety by prison or jail personnel. Finally, "sopas," the Spanish word for "soups," is another common term for an assault.

///

1           j. One of the most important rules for which discipline  
2 may be imposed by the Mexican Mafia LACJ Enterprise is a prohibition  
3 on cooperating with law enforcement.

4           k. Another important rule of the Mexican Mafia that is  
5 enforced within the Mexican Mafia LACJ Enterprise is that any inmate  
6 who is in custody for a sex offense is to be assaulted on sight.  
7 After the sex offender is assaulted, the Mexican Mafia then extorts  
8 payment from the sex offender in exchange for the Mexican Mafia's  
9 agreement that there will be no further assaults.

10           l. The most serious form of discipline is being put on  
11 the "green light list" or being "greenlighted." Being placed on the  
12 green light list means that every Sureno is obligated to severely  
13 assault the person, even if death is likely to result. Only  
14 true/full members of the Mexican Mafia can put a person, group, or  
15 entire gang on the green light list. Those who are put on a green  
16 light list can be removed by the payment of a hefty fine.

17   B.   PURPOSES OF THE ENTERPRISE

18           5. The purposes of the Mexican Mafia LACJ Enterprise include,  
19 but are not limited to, the following:

20           a. Enriching members and associates of the Mexican Mafia  
21 LACJ Enterprise through, among other things, the control of and  
22 participation in the distribution of controlled substances both  
23 within LACJ and in Mexican Mafia-controlled territories outside of  
24 LACJ, extortion of others engaged in the distribution of controlled  
25 substances and other crimes within and outside of LACJ, and extortion  
26 of inmates within LACJ.

27   ///

28   ///

1           b. Maintaining control and authority over LACJ, often  
2 through threats, intimidation, and acts of violence against LACJ  
3 inmates.

4           c. Maintaining control and authority over LACJ in order  
5 to maintain general Mexican Mafia discipline and to ensure that the  
6 rules and orders are obeyed.

7           d. Promoting and enhancing the Mexican Mafia LACJ  
8 Enterprise's members and associates and their activities.

9           e. Punishing Mexican Mafia members and associates who do  
10 not comply with the rules and orders of the Mexican Mafia in general,  
11 including and especially those who cooperate with law enforcement.

12 C. MEANS AND METHODS OF THE ENTERPRISE

13           6. The means and methods by which the defendants and their  
14 associates conduct and participate in the conduct of the affairs of  
15 the Mexican Mafia LACJ Enterprise include the following:

16           a. Engaging in drug trafficking, including the smuggling  
17 of controlled substances into LACJ, as a means to generate income.

18           b. Engaging in extortion, including the operation of the  
19 kitty within LACJ, and including fines for violations of Mexican  
20 Mafia rules, as a means to generate income.

21           c. Working together to collect a portion of the proceeds  
22 of drug trafficking conducted by others both outside of LACJ and  
23 inside of LACJ, such as through the thirds tax, as a means to  
24 generate income.

25           d. Committing, attempting to commit, and threatening to  
26 commit acts of violence to protect and expand the enterprise's  
27 criminal operation, including assaults, murders, acts of  
28 intimidation, and threats of violence directed against rival gang

1 members, witnesses to the Mexican Mafia LACJ Enterprise's criminal  
2 conduct, and Mexican Mafia members and associates who do not follow  
3 the rules and orders of the Mexican Mafia in general.

4 e. Promoting a climate of fear, particularly among rival  
5 gang members, potential witnesses to the enterprise's criminal  
6 conduct, Hispanic gang members, Paisas, or others who may cooperate  
7 with law enforcement within LACJ and throughout southern California,  
8 through acts of violence and threats to commit acts of violence.

9 f. Engaging in the aforementioned criminal activity in  
10 the presence of other Mexican Mafia LACJ Enterprise members or  
11 associates in order to enhance the status of those affirmatively  
12 conducting the criminal acts, and committing the aforementioned  
13 criminal activity for the purpose of earning the respect of Mexican  
14 Mafia LACJ Enterprise members in the hope of achieving higher status.

15 g. In the case of more senior members of the Mexican  
16 Mafia LACJ Enterprise and their designated assistants, including  
17 secretaries, shot-callers, and facilitators, providing instructions  
18 to junior members and associates regarding distribution of controlled  
19 substances, including smuggling controlled substances into LACJ,  
20 collection of drug and extortion proceeds, commission of acts of  
21 violence, commission of fraud and identity theft, and providing  
22 verification that such crimes have occurred.

23 h. In the case of more junior members and associates of  
24 the Mexican Mafia LACJ Enterprise, engaging in the smuggling of  
25 controlled substances into LACJ, carrying out assaults in LACJ and  
26 elsewhere, and committing fraud and identity theft, all on the orders  
27 of more senior members and associates.

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1 D. OBJECT OF THE CONSPIRACY

2 7. Beginning on a date unknown, and continuing to the date of  
3 this Indictment, in Los Angeles and San Bernardino Counties, within  
4 the Central District of California, and elsewhere, defendants JOSE  
5 LANDA-RODRIGUEZ, LUIS VEGA, GABRIEL ZENDEJAS-CHAVEZ, RAFAEL LEMUS,  
6 LUIS GARCIA, ALVINO MUNOZ, DANIEL CERVANTES, MIGUEL CALDERON, ERNESTO  
7 VARGAS, MIGUEL RODRIGUEZ, GILBERT PARRA, GERARDO TAPIA, DONATO  
8 GONZALES, MIGUEL GARCIA, HECTOR DUARTE, SAMANTHA RIVERA, MARK  
9 LANDEROS, JONATHAN VERDEJA, CECILIA VIRGEN, LAUREEN GARCIA, NANCY  
10 DUARTE, VALERIE TREJO, GENESSIS BLANCO, KELLY JO BELL, JOSE FLORES,  
11 MARK LEVY, VALENTIN CORDOVA, FRANKIE MEGORADO, JOSE OLEA, MANUEL  
12 JIMENEZ, ALAVARO LEYVA, CHRIS FERREIRA, DAVID BERNARDINO, ANDREW  
13 PINEDA, ALONDRA GOMEZ, MIRIAM MEZA, ANA MARTINEZ, ALVARO RUIZ, ADRIAN  
14 ARAIZA, GAIL PONCE, DIANA MARTINEZ, MARLON CORNEJO, ANGEL SANCHEZ,  
15 JUAN REYES, RICHARD BAILEY, MICHAEL BENNETT, EDWIN AYALA, DAVID  
16 VILLALOBOS, and DAVID DIAZ, and others known and unknown to the Grand  
17 Jury, being persons employed by and associated with the Mexican Mafia  
18 LACJ Enterprise, an enterprise which was engaged in, and the  
19 activities of which affected, interstate and foreign commerce,  
20 knowingly and intentionally conspired to violate Title 18, United  
21 States Code, Section 1962(c), that is, to conduct and participate,  
22 directly and indirectly, in the conduct of the affairs of that  
23 enterprise through a pattern of racketeering activity, as that term  
24 is defined in Title 18, United States Code, Sections 1961(1) and  
25 1961(5), consisting of:

26 multiple acts involving:

27 a. Murder, in violation of California Penal Code Sections  
28 21a, 31, 182, 187, 189, and 664;

1           b. Kidnapping, in violation of California Penal Code  
2 Sections 21a, 31, 182, 207, 209, and 664;

3           c. Robbery, in violation of California Penal Code  
4 Sections 21a, 31, 182, 211, 212, 212.5, 213, 215, and 664;

5           d. Extortion, in violation of California Penal Code  
6 Sections 21a, 31, 182, 518, 519, 524, and 664;

7           multiple offenses involving:

8           e. the distribution of, possession with intent to  
9 distribute, and conspiracy to possess with intent to distribute and  
10 distribute controlled substances, including methamphetamine, heroin,  
11 cocaine, cocaine base, and marijuana, in violation of Title 21,  
12 United States Code, Sections 841(a)(1) and 846;

13           and multiple acts indictable under the following provisions of  
14 federal law:

15           f. Title 18, United States Code, Section 1512, Tampering  
16 with a Witness;

17           g. Title 18, United States Code, Section 1513,  
18 Retaliating against a witness;

19           h. Title 18, United States Code, Sections 1956 and 1957,  
20 Money Laundering;

21           i. Title 18, United States Code, Section 1028, Identity  
22 Fraud; and

23           j. Title 18, United States Code, Section 1029, Access  
24 Device Fraud.

25           8. It was a further part of the conspiracy that each defendant  
26 agreed that a conspirator would commit at least two acts of  
27 racketeering in the conduct of the affairs of the enterprise.

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1 E. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE  
2 ACCOMPLISHED

3 9. The object of the conspiracy was to be accomplished, in  
4 substance, as follows:

5 a. Defendants JOSE LANDA-RODRIGUEZ and LUIS VEGA and  
6 deceased Mexican Mafia member 1 ("DMM-1") and deceased Mexican Mafia  
7 member 2 ("DMM-2"), as full members of the Mexican Mafia, would have  
8 the right to control and collect criminal proceeds, including  
9 proceeds from extortion and the sale of controlled substances, from  
10 neighborhoods or correctional facilities.

11 i. DMM-1 would control the Los Angeles County Jail  
12 System from around October 2007 until his death on June 20, 2013.

13 ii. Defendant JOSE LANDA-RODRIGUEZ would control the  
14 Los Angeles County Jail System from on or about June 20, 2013, until  
15 at least January 26, 2016, except that he would cede control of NCCF  
16 to DMM-2, on or about July 6, 2014.

17 iii. Defendant LUIS VEGA would carry out Mexican Mafia  
18 business within the Los Angeles County Jail System with the blessing  
19 of DMM-1 from around July 2012 until the death of DMM-1 on June 20,  
20 2013.

21 iv. DMM-2 would control NCCF from July 6, 2014,  
22 through his death in June 2016.

23 b. Defendants GABRIEL ZENDEJAS-CHAVEZ, RAFAEL LEMUS, LUIS  
24 GARCIA, ALVINO MUNOZ, DANIEL CERVANTES, MIGUEL CALDERON, ERNESTO  
25 VARGAS, MIGUEL RODRIGUEZ, GILBERT PARRA, GERARDO TAPIA, and DONATO  
26 GONZALES, and unindicted co-conspirator 1 ("UICC-1"), would act as  
27 facilitators for one or more full members of the Mexican Mafia who  
28 was also a member of the Mexican Mafia LACJ Enterprise and would act



1 with the authority of that Mexican Mafia LACJ Enterprise member in  
2 directing the criminal activities of the Mexican Mafia LACJ  
3 Enterprise, including extortion and the sale of controlled  
4 substances.

5 i. UICC-1 would carry out the orders of DMM-1 within  
6 the Los Angeles County Jail System from about July 2012 through on or  
7 about June 20, 2013.

8 ii. UICC-1 would carry out the orders of defendant  
9 JOSE LANDA-RODRIGUEZ within the Los Angeles County Jail System from  
10 on or about June 20, 2013, through on or about November 5, 2013.

11 iii. Defendant GABRIEL ZENDEJAS-CHAVEZ, from outside  
12 the Los Angeles County Jail System, would use his position as an  
13 attorney to assist defendants JOSE LANDA-RODRIGUEZ and LUIS GARCIA,  
14 DMM-2, and other co-conspirators, with activities inside and outside  
15 the Los Angeles County Jail System.

16 iv. Defendant RAFAEL LEMUS, from outside the Los  
17 Angeles County Jail system, would work for and carry out the orders  
18 for DMM-2, including collecting drug proceeds, fines, and kitty  
19 extortion from NCCF from on or before February 4, 2014, through  
20 November 22, 2015.

21 v. Defendant LUIS GARCIA, from inside the Los  
22 Angeles County Jail System, would work for and carry out the orders  
23 of defendant JOSE LANDA-RODRIGUEZ from on or about November 5, 2013,  
24 through on or about May 28, 2014.

25 vi. Defendant ALVINO MUNOZ, from both inside and  
26 outside the Los Angeles County Jail System, would work for and carry  
27 out the orders of defendant JOSE LANDA-RODRIGUEZ from about April  
28 2015 through at least July 2015.

1                   vii. Defendant DANIEL CERVANTES, from outside the Los  
2 Angeles County Jail System, would work for and carry out the orders  
3 of DMM-1 from on or about October 22, 2012, through on or about May  
4 10, 2013.

5                   viii. Defendant MIGUEL CALDERON, from outside the  
6 Los Angeles County Jail System, would work to direct activities  
7 within NCCF, MCJ, and Twin Towers on behalf of defendant JOSE LANDA-  
8 RODRIGUEZ from on or about June 20, 2013, through on or about June  
9 30, 2013.

10                  ix. Defendant ERNESTO VARGAS, from outside the Los  
11 Angeles County Jail System, would work to direct activities within  
12 NCCF on behalf of defendant JOSE LANDA-RODRIGUEZ from on or about  
13 October 1, 2013, through on or about July 6, 2014.

14                  x. Defendant MIGUEL RODRIGUEZ, from outside the Los  
15 Angeles County Jail System, would work to direct activities within  
16 NCCF on behalf of DMM-2, from on or about July 6, 2014, until on or  
17 about October 23, 2014.

18                  xi. Defendant GILBERT PARRA, from both inside and  
19 outside the Los Angeles County Jail System, would direct the  
20 activities within NCCF on behalf of defendant JOSE LANDA-RODRIGUEZ  
21 from on or about October 10, 2013, to on or about December 26, 2013.

22                  xii. Defendant GERARDO TAPIA, from outside the Los  
23 Angeles County Jail System, would direct drug trafficking activities  
24 outside the Los Angeles County Jail System on behalf of DMM-2 from on  
25 or about April 18, 2014, through on or about May 9, 2014.

26                  xiii. Defendant DONATO GONZALEZ, from both inside  
27 and outside the Los Angeles County Jail System, would direct  
28 activities within and outside the Los Angeles County Jail System on

1 behalf of DMM-2 from on or about April 18, 2014, through on or about  
2 May 9, 2014.

3 c. Defendants MIGUEL GARCIA, HECTOR DUARTE, SAMANTHA  
4 RIVERA, MARK LANDEROS, and JONATHAN VERDEJA, and unindicted co-  
5 conspirator 2 ("UICC-2"), unindicted co-conspirator 3 ("UICC-3")  
6 unindicted co-conspirator 4 ("UICC-4"), and unindicted co-conspirator  
7 5 ("UICC-5"), would act as facilitators for one or more full members  
8 of the Mexican Mafia, and would carry out specific orders related to  
9 the criminal activities of the Mexican Mafia LACJ Enterprise,  
10 including extortion and the sale of controlled substances, in  
11 specific locations, including LACJ.

12 i. UICC-3, from inside the Los Angeles County Jail  
13 System, would direct activities at MCJ and Twin Towers on behalf of  
14 DMM-1 from on or about December 18, 2012, through on or about June  
15 20, 2013.

16 ii. Defendant MIGUEL GARCIA, from inside the Los  
17 Angeles County Jail System, would direct activities at NCCF on behalf  
18 of DMM-1 from on or about April 5, 2013, through on or about April  
19 12, 2013.

20 iii. Unindicted co-conspirator 9 ("UICC-9"), from  
21 inside the Los Angeles County Jail System, would direct activities at  
22 MCJ and Twin Towers on behalf of defendant JOSE LANDA-RODRIGUEZ from  
23 on or about June 23, 2013, through on or about July 3, 2013.

24 iv. Defendant HECTOR DUARTE, from inside the Los  
25 Angeles County Jail System, would direct activities at NCCF on behalf  
26 of DMM-2 from on or about July 6, 2014, through on or about November  
27 10, 2014.

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1                   v. Defendant SAMANTHA RIVERA, from outside the Los  
2 Angeles County Jail System, would coordinate defendant JOSE LANDA-  
3 RODRIGUEZ'S dealings with other Mexican Mafia members from on or  
4 about June 20, 2013, through on or about December 18, 2015.

5                   vi. Defendant MARK LANDEROS, from inside the Los  
6 Angeles County Jail System, would direct activities at MCJ and Twin  
7 Towers on behalf of defendant JOSE LANDA-RODRIGUEZ, from on or about  
8 July 24, 2013, through on or about June 5, 2014.

9                   vii. Defendant JONATHAN VERDEJA, from inside the Los  
10 Angeles County Jail System, would direct activities at NCCF on behalf  
11 of defendant JOSE LANDA-RODRIGUEZ from on or about October 16, 2013,  
12 through on or about December 26, 2013.

13                   viii. UICC-2, from inside the Los Angeles County  
14 Jail System, would direct activities at MCJ and Twin Towers on behalf  
15 of defendant JOSE LANDA-RODRIGUEZ.

16                   ix. UICC-4, from inside the Los Angeles County Jail  
17 System, would direct activities at NCCF on behalf of defendant JOSE  
18 LANDA-RODRIGUEZ from on or about June 20, 2013, through on or about  
19 June 30, 2013.

20                   x. UICC-5, from outside LACJ, would direct  
21 activities at NCCF on behalf of DMM-2, from on or about August 22,  
22 2015, through June 4, 2016.

23                   d. Defendants CECILIA VIRGEN, LAUREEN GARCIA, NANCY  
24 DUARTE, VALERIE TREJO, GENESSIS BLANCO, and KELLY JO BELL, and UICC-  
25 6, would act as secretaries for high-level Mexican Mafia LACJ  
26 Enterprise associates, passing messages regarding, facilitating  
27 communication about, and keeping records of the criminal activities

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1 of the Mexican Mafia LACJ Enterprise, including extortion and the  
2 sale of controlled substances.

3 i. Defendant CECILIA VIRGEN would act as the  
4 secretary for defendant DANIEL CERVANTES for activities inside the  
5 Los Angeles County Jail System from on or about December 18, 2012,  
6 through on or about May 22, 2013.

7 ii. Defendant LAUREEN GARCIA would act as the  
8 secretary for defendant ERNESTO VARGAS for activities inside NCCF  
9 from on or about October 1, 2013, through on or about November 1,  
10 2013.

11 iii. Defendant NANCY DUARTE would act as the secretary  
12 for defendant HECTOR DUARTE for activities at NCCF from on or about  
13 July 6, 2014, through on or about October 23, 2014.

14 iv. Defendant VALERIE TREJO would act as the  
15 secretary for UICC-3 for activities at MCJ and Twin Towers from on or  
16 about February 2013, through on or about June 20, 2013.

17 v. Defendant KELLY JO BELL would act as a secretary  
18 for defendant ALVINO MUNOZ from August 19, 2015, through October 14,  
19 2015.

20 vi. Defendants GENESSIS BLANCO would act as a  
21 secretary for DMM-2 and UICC-6 for activities inside NCCF from on or  
22 about August 22, 2015, through on or about October 23, 2015.

23 vii. UICC-6 would act as a secretary for defendant  
24 MARK LANDEROS in January 2016.

25 e. Unindicted co-conspirator 7 ("UICC-7") would carry out  
26 the orders of DMM-1, UICC-1, and UICC-3 to control Twin Towers from  
27 on or about July 17, 2012, through on or about June 20, 2013.

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1           f. Defendants JOSE FLORES, MARK LEVY, VALENTIN CORDOVA,  
2 FRANKIE MEGORADO, JOSE OLEA, MANUEL JIMENEZ, ALAVARO LEYVA, CHRIS  
3 FERREIRA, MIGUEL GARCIA, DAVID BERNARDINO, and ANDREW PINEDA, and  
4 unindicted co-conspirators Robert Ramirez, UICC-4, unindicted co-  
5 conspirator 8 ("UICC-8"), unindicted co-conspirator 10 ("UICC-10"),  
6 unindicted co-conspirator 11 ("UICC-11"), and unindicted co-  
7 conspirator 12 ("UICC-12"), would carry out the orders of the Mexican  
8 Mafia LACJ Enterprise within specific portions of the Los Angeles  
9 County Jail System, thereby facilitating the criminal activities of  
10 the Mexican Mafia LACJ Enterprise, including extortion and the sale  
11 of controlled substances.

12           i. Defendant JOSE FLORES would carry out the orders  
13 of defendant CECILIA VIRGEN in NCCF from on or about December 19,  
14 2012, through on or about January 22, 2013.

15           ii. UICC-8 would carry out the orders of defendant  
16 CECILIA VIRGEN inside NCCF from on or about October 26, 2012, through  
17 on or about December 28, 2012.

18           iii. Defendant MARK LEVY would carry out the orders of  
19 defendant CECILIA VIRGEN inside NCCF from on or about February 10,  
20 2013, through on or about February 13, 2013.

21           iv. Defendant VALENTIN CORDOVA would carry out the  
22 orders of defendant CECILIA VIRGEN inside NCCF from on or about April  
23 2, 2013, through on or about May 20, 2013.

24           v. UICC-11 would carry out the orders of defendant  
25 CECILIA VIRGEN inside NCCF from on or about March 25, 2013, through  
26 on or about May 23, 2013.

27           vi. Defendant FRANKIE MEGORADO would carry out the  
28 orders of defendant CECILIA VIRGEN inside NCCF from on or about April

1 6, 2013, through on or about May 22, 2013, and would carry out the  
2 orders of defendant LAUREEN GARCIA inside NCCF from on or about May  
3 23, 2013, through October 5, 2013.

4 vii. Defendant JOSE OLEA would carry out the orders of  
5 defendant CECILIA VIRGEN inside NCCF from on or about April 7, 2013,  
6 through on or about April 13, 2013.

7 viii. UICC-10 would carry out the orders of UICC-3  
8 inside MCJ and Twin Towers from on or about December 30, 2012,  
9 through on or about May 30, 2013.

10 ix. UICC-4 would carry out the orders of defendant  
11 MIGUEL CALDERON inside NCCF from on or about June 20, 2013, through  
12 on or about June 30, 2013.

13 x. Defendant MANUEL JIMENEZ would carry out the  
14 orders of defendant LAUREEN GARCIA inside NCCF from on or about  
15 October 1, 2013, through on or about November 1, 2013.

16 xi. Defendant ALAVARO LEYVA would carry out the  
17 orders of defendant LAUREEN GARCIA inside NCCF from on or about  
18 October 2, 2013, through on or about October 5, 2013.

19 xii. Defendant CHRIS FERREIRA would carry out the  
20 orders of defendant NANCY DUARTE inside NCCF from on or about July 6,  
21 2014, through on or about July 25, 2014.

22 xiii. Defendant MIGUEL GARCIA would carry out the  
23 orders of defendant ERNESTO VARGAS inside NCCF from on or about  
24 September 24, 2013, through on or about October 21, 2013.

25 xiv. Defendant DAVID BERNARDINO would carry out the  
26 orders of defendant NANCY DUARTE inside NCCF from at least no later  
27 than September 1, 2014 through at least no earlier than September 6,  
28 2014.

1                   xv. Defendant ANDREW PINEDA would carry out the  
2 orders of defendant GENESSIS BLANCO inside NCCF from on or about  
3 August 22, 2015, through on or about October 23, 2015.

4                   xvi. Unindicted co-conspirator Robert Ramirez would  
5 carry out the orders of defendant KELLY JO BELL at MCJ from on or  
6 about August 19, 2015, through on or about October 14, 2015.

7                   xvii. UICC-12 would carry out the orders of  
8 defendant MARK LANDEROS in MCJ in January 2016.

9                   g. Defendants ALONDRA GOMEZ, MIRIAM MEZA, ANA MARTINEZ,  
10 ALVARO RUIZ, ADRIAN ARAIZA, GAIL PONCE, and DIANA MARTINEZ, and  
11 unindicted co-conspirators Kristen Ayala, unindicted co-conspirator  
12 14 ("UICC-14"), unindicted co-conspirator 15 ("UICC-15"), and  
13 unindicted co-conspirator 16 ("UICC-16"), would assist Mexican Mafia  
14 LACJ Enterprise members and associates in directing activities inside  
15 and outside the Los Angeles County Jail System, thereby facilitating  
16 the criminal activities of the Mexican Mafia LACJ Enterprise,  
17 including extortion and the sale of controlled substances.

18                   i. Defendant ALONDRA GOMEZ would assist defendant  
19 DANIEL CERVANTES in collecting and laundering the proceeds of Mexican  
20 Mafia LACJ Enterprise activities.

21                   ii. UICC-14 would pass DMM-1's directions regarding  
22 the collection and laundering of the proceeds of Mexican Mafia LACJ  
23 Enterprise activities to defendant DANIEL CERVANTES.

24                   iii. Defendant MIRIAM MEZA would assist UICC-3 and  
25 defendant CECILIA VIRGEN in collecting proceeds of Mexican Mafia LACJ  
26 Enterprise activities.

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1           iv. Defendant ANA MARTINEZ would assist UICC-10 by  
2 obtaining "burnout" phones, arranging the smuggling of drugs into the  
3 Los Angeles County Jail System, and collecting money for UICC-3.

4           v. Unindicted co-conspirator Kristen Ayala would  
5 assist defendant MARK LANDEROS in smuggling drugs into the Los  
6 Angeles County Jail System.

7           vi. Defendant ALVARO RUIZ would assist defendant  
8 DONATO GONZALES by organizing shipments of drugs into the Los Angeles  
9 County Jail System, and would assist defendant JOSE LANDA-RODRIGUEZ  
10 by passing messages.

11           vii. Defendant ADRIAN ARAIZA would assist defendant  
12 DANIEL CERVANTES by providing drugs to be smuggled into the Los  
13 Angeles County Jail System.

14           viii. UICC-15 would assist UICC-3 by moving the  
15 kitty money from defendant ANGEL SANCHEZ's inmate trust account to  
16 defendant VALERIE TREJO.

17           ix. Defendant GAIL PONCE would pass defendant HECTOR  
18 DUARTE's orders to defendant DAVID BERNARDINO.

19           x. UICC-16 would pass messages to and from UICC-12.

20           xi. Defendant DIANA MARTINEZ would assist defendant  
21 GERARDO TAPIA in trafficking controlled substances, and in carrying  
22 out orders to commit acts of violence on behalf of Mexican Mafia LACJ  
23 Enterprise members.

24           h. Defendants MARLON CORNEJO, JUAN REYES, RICHARD BAILEY,  
25 MICHAEL BENNETT, EDWIN AYALA, DAVID VILLALOBOS, DAVID DIAZ, ANGEL  
26 SANCHEZ, VALERIE TREJO, KELLY JO BELL, MARK LANDEROS, LUIS GARCIA,  
27 ANA MARTINEZ, and others known and unknown to the Grand Jury, would  
28 carry out the orders and business of the Mexican Mafia LACJ

1 Enterprise in furtherance of its criminal activities, including  
2 extortion and the sale of controlled substances.

3 i. Defendants MARK LANDEROS, LUIS GARCIA, DAVID  
4 VILLALOBOS, and DAVID DIAZ, and others known and unknown to the Grand  
5 Jury would engage in acts of violence inside the Los Angeles County  
6 Jail System to enforce Mexican Mafia rules and discipline, to collect  
7 debts on behalf of the Mexican Mafia LACJ Enterprise, including  
8 proceeds from the sale of controlled substances, and to extort on  
9 behalf of the Mexican Mafia LACJ Enterprise.

10 ii. Defendants RICHARD BAILEY, VALERIE TREJO, KELLY  
11 JO BELL, and ANA MARTINEZ and others known and unknown to the grand  
12 jury would assist in the smuggling of drugs into the Los Angeles  
13 County Jail System.

14 iii. Unindicted co-conspirators known and unknown to  
15 the Grand Jury would smuggle drugs into the Los Angeles County Jail  
16 System.

17 iv. Defendants MARLON CORNEJO, JUAN REYES, MICHAEL  
18 BENNETT, EDWIN AYALA, and others known and unknown to the grand jury  
19 would smuggle drugs within the Los Angeles County Jail System.

20 v. Defendants MARLON CORNEJO, JUAN REYES, MICHAEL  
21 BENNETT, EDWIN AYALA, and others known and unknown to the grand jury  
22 would smuggle written communications within the Los Angeles County  
23 Jail System.

24 vi. Defendant ANGEL SANCHEZ would allow his inmate  
25 trust account to be used to move and launder Mexican Mafia LACJ  
26 Enterprise proceeds.

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1 F. OVERT ACTS

2 10. In furtherance of the conspiracy and to accomplish its  
3 object, on or about the following dates, defendants JOSE LANDA-  
4 RODRIGUEZ, LUIS VEGA, GABRIEL ZENDEJAS-CHAVEZ, RAFAEL LEMUS, LUIS  
5 GARCIA, ALVINO MUNOZ, DANIEL CERVANTES, MIGUEL CALDERON, ERNESTO  
6 VARGAS, MIGUEL RODRIGUEZ, GILBERT PARRA, GERARDO TAPIA, DONATO  
7 GONZALES, MIGUEL GARCIA, HECTOR DUARTE, SAMANTHA RIVERA, MARK  
8 LANDEROS, JONATHAN VERDEJA, CECILIA VIRGEN, LAUREEN GARCIA, NANCY  
9 DUARTE, VALERIE TREJO, GENESSIS BLANCO, KELLY JO BELL, JOSE FLORES,  
10 MARK LEVY, VALENTIN CORDOVA, FRANKIE MEGORADO, JOSE OLEA, MANUEL  
11 JIMENEZ, ALAVARO LEYVA, CHRIS FERREIRA, DAVID BERNARDINO, ANDREW  
12 PINEDA, ALONDRA GOMEZ, MIRIAM MEZA, ANA MARTINEZ, ALVARO RUIZ, ADRIAN  
13 ARAIZA, GAIL PONCE, DIANA MARTINEZ, MARLON CORNEJO, ANGEL SANCHEZ,  
14 JUAN REYES, RICHARD BAILEY, MICHAEL BENNETT, EDWIN AYALA, DAVID  
15 VILLALOBOS, and DAVID DIAZ, and others known and unknown to the Grand  
16 Jury, committed various overt acts within the Central District of  
17 California, and elsewhere, including, but not limited to, the  
18 following:

19 Orders to Assault or Kill Persons in Violation of Mexican Mafia Rules  
20 and to Collect Taxes in LACJ

21 Overt Act No. 1: On or before July 17, 2012, defendant LUIS  
22 VEGA, in a handwritten kite, ordered unindicted co-conspirator 17  
23 ("UICC-17") to make sure that J.L. would be assaulted for falsely  
24 claiming to have authority within the Mexican Mafia.

25 Overt Act No. 2: On or before July 17, 2012, defendant LUIS  
26 VEGA, in a handwritten "kite," ordered UICC-17 to ensure that a  
27 disrespectful Sureno would be stabbed 13 times as discipline for  
28 disrespecting Mexican Mafia member defendant LUIS VEGA.

1        Overt Act No. 3:     On or before July 17, 2012, defendant LUIS  
2 VEGA ordered UICC-17 to collect the thirds tax from a Sureno known as  
3 "Cyco."

4        Appointment of Humberto Miranda to Run Mexican Mafia LACJ Enterprise  
5        Business within Twin Towers, Including Collection of Extortion  
6        Proceeds

7        Overt Act No. 4:     On or before July 17, 2012, defendant LUIS  
8 VEGA ordered that UICC-7 run Twin Towers, including the collection of  
9 the "kitty," the collection of the thirds tax, and the collection of  
10 fines.

11       Overt Act No. 5:     From July 17, 2012, through January 19,  
12 2013, UICC-7 ran Twin Towers, including the collection of kitty  
13 money, the collection of the thirds tax, and the collection of fines.

14       Overt Act No. 6:     Prior to January 2, 2013, UICC-7 ordered  
15 that a Sureno known as "Rooster" be assaulted for losing previous  
16 kites intended for UICC-7.

17       Smuggling and Possession of Cocaine and Methamphetamine within LACJ  
18       and Collection of the Thirds Tax

19       Overt Act No. 7:     On or before September 10, 2012, J.M.  
20 possessed and distributed cocaine and methamphetamine within MCJ.

21       Overt Act No. 8:     On or before September 10, 2012, J.M. paid  
22 his thirds tax on the cocaine and methamphetamine to UICC-1.

23       Overt Act No. 9:     On September 10, 2012, defendant MARLON  
24 CORNEJO possessed J.M.'s thirds tax, consisting of approximately 2.25  
25 grams of cocaine and .09 grams of methamphetamine, in order to give  
26 it to UICC-1.

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1        Overt Act No. 10:    On September 10, 2012, J.M. possessed  
2 approximately .15 grams of cocaine within LACJ with intent to  
3 distribute.

4        Laundrying of Money from LACJ

5        Overt Act No. 11:    From August 22, 2012, through at least May  
6 9, 2013, defendant ALONDRA GOMEZ opened and maintained a post office  
7 box for the purpose of collecting payments from Mexican Mafia LACJ  
8 Enterprise activities.

9        Overt Act No. 12:    On October 22, 2012, defendant DANIEL  
10 CERVANTES met with a person he believed to be a criminal associate,  
11 but who was actually an undercover agent from Homeland Security  
12 Investigations (the "HSI UC"), to launder the proceeds of Mexican  
13 Mafia LACJ Enterprise activities.

14        Overt Act No. 13:    On October 22, 2012, defendant DANIEL  
15 CERVANTES gave \$9,239 in money orders representing proceeds of  
16 Mexican Mafia LACJ Enterprise activities to the HSI UC for the HSI UC  
17 to launder by negotiating the money orders in exchange

18        Overt Act No. 14:    On October 22, 2012, defendant DANIEL  
19 CERVANTES received from the HSI UC approximately \$8,315 in cash  
20 representing the proceeds from the negotiation of the money orders.

21        Laundrying of Money from LACJ

22        Overt Act No. 15:    On November 5, 2012, defendant DANIEL  
23 CERVANTES met with the HSI UC and gave approximately \$11,032 in money  
24 orders representing proceeds of Mexican Mafia LACJ Enterprise  
25 activities to the HSI UC for the HSI UC to launder by negotiating the  
26 money orders in exchange for a fee.

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1       Overt Act No. 16:   On November 6, 2012, defendant DANIEL  
2 CERVANTES received from the HSI UC approximately \$9,928 in cash  
3 representing the proceeds from the negotiation of the money orders.  
4 Assault of R.G. for Interfering with Drug Trafficking

5       Overt Act No. 17:   Prior to December 6, 2012, defendant CECILIA  
6 VIRGEN ordered defendant JOSE FLORES to have R.G. assaulted for  
7 violating Mexican Mafia rules by opening drugs that belonged to the  
8 Mexican Mafia LACJ Enterprise without authorization.

9       Overt Act No. 18:   On or before December 6, 2012, defendant  
10 JOSE FLORES ordered that R.G. be assaulted for violating Mexican  
11 Mafia rules by opening drugs that belonged to the Mexican Mafia LACJ  
12 Enterprise without authorization.

13       Overt Act No. 19:   On December 6, 2012, unindicted co-  
14 conspirators assaulted R.G. on defendant JOSE FLORES' orders.

15       Overt Act No. 20:   On December 20, 2012, in a recorded  
16 telephone call, defendant CECILIA VIRGEN advised defendant JOSE  
17 FLORES that R.G. had been assaulted.

18       Overt Act No. 21:   On December 20, 2012, in a recorded  
19 telephone call, defendant CECILIA VIRGEN ordered that R.G. be  
20 assaulted again, and defendant JOSE FLORES suggested that the assault  
21 be for 39 seconds.

22 Laundering of Money from LACJ

23       Overt Act No. 22:   On November 9, 2012, UICC-14 called  
24 defendant DANIEL CERVANTES from LACJ, and in coded language during  
25 this recorded telephone call, defendant DANIEL CERVANTES told UICC-14  
26 that he had \$13,000 in proceeds of Mexican Mafia LACJ Enterprise  
27 activities and asked what he should do with it.

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1       Overt Act No. 23:    On November 9, 2012, UICC-14 asked DMM-1  
2 what DANIEL CERVANTES should do with the \$13,000.

3       Overt Act No. 24:    On November 9, 2012, in a recorded telephone  
4 conversation, UICC-14 passed on to defendant DANIEL CERVANTES DMM-1's  
5 directions that defendant DANIEL CERVANTES should launder all \$13,000  
6 and that \$12,000 of Mexican Mafia LACJ Enterprise proceeds be given  
7 to DMM-1's wife.

8       Overt Act No. 25:    On December 6, 2012, defendant DANIEL  
9 CERVANTES met with the HSI UC and gave approximately \$13,000 in money  
10 orders representing proceeds of Mexican Mafia LACJ Enterprise  
11 activities in LACJ to the HSI UC for the HSI UC to launder by  
12 negotiating the money orders in exchange for a fee.

13       Overt Act No. 26:    On December 7, 2012, defendant DANIEL  
14 CERVANTES received from the HSI UC approximately \$10,237 in cash  
15 representing the proceeds from the negotiation of the money orders  
16 and approximately \$2,100 in uncashed money orders.

17       Overt Act No. 27:    On December 13, 2012, defendant DANIEL  
18 CERVANTES arranged for the HSI UC to meet with defendant ALONDRA  
19 GOMEZ for the purpose of laundering approximately \$2,100 in money  
20 orders representing proceeds from Mexican Mafia LACJ Enterprise  
21 activities.

22       Overt Act No. 28:    On December 13, 2012, defendant ALONDRA  
23 GOMEZ met with the HSI UC and negotiated approximately \$2,100 in  
24 money orders representing proceeds of Mexican Mafia LACJ Enterprise  
25 activities in LACJ.

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1 Extortion and Assault of J.D.

2 Overt Act No. 29: On December 18, 2012, in a recorded  
3 telephone call, defendant CECILIA VIRGEN asked UICC-3 to collect a  
4 debt owed to her by J.D. or to assault J.D. if he did not pay.

5 Overt Act No. 30: From December 18, 2012, through February 11,  
6 2013, UICC-3 arranged for J.D. to be repeatedly assaulted in LACJ for  
7 failing to pay a debt.

8 Overt Act No. 31: Prior to January 18, 2013, unindicted co-  
9 conspirator 18 ("UICC-18") allowed his LACJ inmate trust account to  
10 be used to collect the debt from J.D.

11 Overt Act No. 32: On January 25, 2013, UICC-3 told defendant  
12 CECILIA VIRGEN that \$200 from J.D. had been placed on UICC-18's LACJ  
13 inmate trust account.

14 Overt Act No. 33: On January 29, 2013, in a recorded telephone  
15 call, defendant CECILIA VIRGEN asked UICC-3 if J.D. had paid his  
16 debt.

17 Overt Act No. 34: On February 7, 2013, in a recorded telephone  
18 call, UICC-3 instructed defendant VALERIE TREJO to pass a message to  
19 defendant CECILIA VIRGEN that J.D. had not paid his debt, and  
20 defendant VALERIE TREJO confirmed that she sent the message.

21 Overt Act No. 35: On February 11, 2013, in a recorded  
22 telephone call, UICC-3 again instructed defendant VALERIE TREJO to  
23 tell defendant CECILIA VIRGEN that J.D. had not paid the debt.

24 Overt Act No. 36: On February 11, 2013, in a recorded  
25 telephone call, UICC-3 told defendant CECILIA VIRGEN that J.D. had  
26 not paid the debt but had been assaulted, and UICC-3 and defendant  
27 CECILIA VIRGEN discussed where they could find J.D. outside of LACJ.

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1 Extortion of L.O.

2 Overt Act No. 37: From December 17, 2012, through December 30,  
3 2012, UICC-3 extorted approximately \$2,000 worth of heroin from L.O.

4 Overt Act No. 38: From December 19, 2012, through December 30,  
5 2012, in recorded telephone calls from UICC-3, defendant CECILIA  
6 VIRGEN discussed her plans to obtain drugs provided by L.O. as a  
7 result of extortion and to have the drugs smuggled into LACJ.

8 Smuggling of Heroin and Methamphetamine within LACJ

9 Overt Act No. 39: On December 19, 2012, UICC-3 arranged to  
10 transport approximately 5.33 grams of black tar heroin and 1.65 grams  
11 of a mixture or substance containing a detectable amount of  
12 methamphetamine from MCJ to NCCF to be sold on behalf of the Mexican  
13 Mafia LACJ Enterprise.

14 Overt Act No. 40: On December 19, 2012, defendant JUAN REYES  
15 transported approximately 5.33 grams of black tar heroin and 1.65  
16 grams of a mixture or substance containing a detectable amount of  
17 methamphetamine from MCJ to NCCF in his body on behalf of the Mexican  
18 Mafia LACJ Enterprise.

19 Overt Act No. 41: On December 23, 2012, in a recorded  
20 telephone call, defendant CECILIA VIRGEN informed UICC-3 that the  
21 black tar heroin and methamphetamine carried by defendant JUAN REYES  
22 had been seized by law enforcement.

23 Assault and Extortion of S.M.

24 Overt Act No. 42: Prior to December 21, 2012, defendant  
25 CECILIA VIRGEN ordered that S.M. be assaulted because he was in bad  
26 standing with the Mexican Mafia LACJ Enterprise.

27 Overt Act No. 43: On December 21, 2012, unindicted co-  
28 conspirators assaulted S.M.

1 Smuggling of Heroin into LACJ

2 Overt Act No. 44: From October 26, 2012, through October 31,  
3 2012, in recorded telephone calls, UICC-8 and unindicted co-  
4 conspirator 19 ("UICC-19") arranged for an attorney, unindicted co-  
5 conspirator 20 ("UICC-20") to bring heroin into LACJ by hiding the  
6 heroin in a greeting card that UICC-19 would give to UICC-20 to pass  
7 to UICC-8.

8 Overt Act No. 45: Prior to and on December 22, 2012, in  
9 recorded telephone calls, defendant CECILIA VIRGEN discussed with  
10 UICC-8 the plan to smuggle heroin into LACJ, and defendant CECILIA  
11 VIRGEN directed UICC-8 to allow her to add approximately one-half  
12 ounce of heroin into the heroin-filled greeting card.

13 Overt Act No. 46: On December 24, 2012, in a recorded  
14 telephone conversation, UICC-8 and UICC-19 ordered approximately one  
15 and one-half ounces of heroin from unindicted co-conspirator 21  
16 ("UICC-21") and discussed that the destination for the heroin was  
17 LACJ.

18 Overt Act No. 47: On December 25, 2012, UICC-19 purchased  
19 approximately one and one-half ounces of heroin from UICC-21.

20 Overt Act No. 48: On December 28, 2012, as arranged by  
21 defendant CECILIA VIRGIN, UICC-8, UICC-19, UICC-20 attempted to  
22 smuggle a greeting card containing approximately 23.8 grams of heroin  
23 into LACJ, but were caught by LASD deputies.

24 Collection of the Kitty

25 Overt Act No. 49: From July 14, 2012, through May 22, 2013,  
26 defendant MIRIAM MEZA collected kitty proceeds, drug proceeds, and  
27 other extortion proceeds from LACJ and placed that money onto the

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1 inmate trust accounts of unindicted co-conspirators UICC-3 and  
2 UICC-18.

3 Orders to Assault R.G. and "Stomper" from the Rockwood gang because  
4 of R.G.'s Interference with Drug Trafficking

5 Overt Act No. 50: From December 29, 2012, through December 31,  
6 2012, in recorded telephone calls from defendant JOSE FLORES,  
7 defendant CECILIA VIRGEN ordered that R.G. be assaulted for  
8 protesting his previous assault and that a Sureno known as "Stomper"  
9 from the Rockwood gang be assaulted for speaking up on behalf of R.G.

10 Money Laundering Using an Inmate Trust Account

11 Overt Act No. 51: On or before December 27, 2012, UICC-7  
12 directed his subordinates to put the kitty and drug money onto the  
13 inmate trust account of defendant ANGEL SANCHEZ.

14 Overt Act No. 52: From December 23, 2012, through January 31,  
15 2013, defendant ANGEL SANCHEZ allowed his LACJ inmate trust account  
16 to be used by the Mexican Mafia LACJ Enterprise to launder the kitty  
17 and drug money.

18 Overt Act No. 53: On or before January 25, 2013, defendant  
19 MARK LANDEROS sent a kite to inform UICC-3 that the kitty money was  
20 being placed on the LACJ inmate trust account of defendant ANGEL  
21 SANCHEZ.

22 Overt Act No. 54: From December 23, 2012, through January 19,  
23 2013, in recorded telephone conversations, defendant ANGEL SANCHEZ  
24 and UICC-15 discussed withdrawing the Mexican Mafia LACJ Enterprise's  
25 money from defendant ANGEL SANCHEZ' LACJ inmate trust account.

26 Overt Act No. 55: From on or before January 11, 2013, through  
27 January 31, 2013, UICC-15, withdrew the kitty and drug money from

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1 defendant ANGEL SANCHEZ' LACJ inmate trust account to be given to  
2 defendant VALERIE TREJO for UICC-3.

3 Order to Assault or Murder J.R.

4 Overt Act No. 56: In September 2011, defendant LUIS VEGA  
5 ordered J.R. to allow his home to be used to store weapons and drugs.

6 Overt Act No. 57: On November 16, 2011, because of J.R.'s  
7 refusal to allow his home to be used to store weapons and drugs,  
8 defendant LUIS VEGA gathered fellow gang members, obtained a firearm,  
9 and went to J.R.'s residence to threaten him into agreeing to allow  
10 his home to be used to store weapons and drugs.

11 Overt Act No. 58: On or after November 16, 2011, defendant  
12 LUIS VEGA placed J.R. on the "Green Light" list because J.R. called  
13 the police and caused defendant LUIS VEGA's arrest.

14 Overt Act No. 59: On December 1, 2012, upon learning that J.R.  
15 was in LACJ, defendant LUIS VEGA sent a kite ordering that J.R. be  
16 murdered to a person defendant LUIS VEGA thought was a fellow MS-13  
17 gang member, but who was actually J.R.

18 Laundering of Money from LACJ

19 Overt Act No. 60: On January 9, 2013, defendant DANIEL  
20 CERVANTES met with and gave approximately \$10,046 in money orders  
21 representing proceeds of Mexican Mafia LACJ Enterprise activities to  
22 the HSI UC for the HSI UC to launder by negotiating the money orders  
23 in exchange for a fee.

24 Overt Act No. 61: On January 10, 2013, defendant DANIEL  
25 CERVANTES received from the the HSI UC approximately \$9,414 in cash  
26 representing the proceeds from the negotiation of the money orders.

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1 Attempted Smuggling of Marijuana and Correspondence Related to  
2 Extortion and Money Laundering into LACJ

3 Overt Act No. 62: On January 18, 2013, unindicted co-  
4 conspirator 22 ("UICC-22") transported, in his body, marijuana, a  
5 kite discussing extortion and money laundering, and three roll calls  
6 from UICC-7 intended for UICC-1.

7 Smuggling of Heroin and Methamphetamine into LACJ

8 Overt Act No. 63: From December 19, 2012, through January 22,  
9 2013, defendants CECILIA VIRGEN and JOSE FLORES, and UICC-3 and  
10 unindicted co-conspirator 23 ("UICC-23"), arranged to smuggle  
11 approximately 64.6 grams of heroin and approximately 36.7 grams of  
12 methamphetamine into LACJ on behalf of DMM-1.

13 Overt Act No. 64: On January 19, 2013, at defendant CECILIA  
14 VIRGEN's direction, UICC-23 possessed and smuggled in his body at  
15 least 64.6 grams of heroin and 36.7 grams of methamphetamine into  
16 LACJ for DMM-1.

17 Overt Act No. 65: On January 22, 2013, UICC-23 gave an unknown  
18 amount of a controlled substance to UICC-3 in LACJ.

19 Possession of Methamphetamine, Cash, and Firearms

20 Overt Act No. 66: On January 29, 2013, ADRIAN ARAIZA possessed  
21 with intent to distribute approximately 6,317.7 grams of  
22 methamphetamine, on behalf of DMM-1.

23 Overt Act No. 67: On January 29, 2013, ADRIAN ARAIZA possessed  
24 two firearms in order to protect the approximately 6,317.7 grams of  
25 methamphetamine.

26 Overt Act No. 68: On January 29, 2013, defendant ADRIAN ARAIZA  
27 possessed approximately \$444,372 in drug proceeds on behalf of DMM-1.

28 Attempted Murder of M.A.

1       Overt Act No. 69:   On February 7, 2013, defendant LUIS GARCIA  
2 attempted to kill M.A. in LACJ because M.A. was on the "Green Light"  
3 list.

4 Assault and Extortion of S.M.

5       Overt Act No. 70:   From February 10, 2013, through February 13,  
6 2013, in recorded telephone calls, defendants CECILIA VIRGEN and MARK  
7 LEVY arranged for S.M. to be assaulted until he made a payment to the  
8 Mexican Mafia LACJ Enterprise.

9       Overt Act No. 71:   On February 13, 2013, unindicted  
10 coconspirators assaulted S.M. because of his bad standing with the  
11 Mexican Mafia LACJ Enterprise.

12 Smuggling of Methamphetamine, Heroin, and Marijuana into LACJ

13       Overt Act No. 72:   From January 22, 2013, through February 28,  
14 2013, defendants CECILIA VIRGEN, VALERIE TREJO, and RICHARD BAILEY,  
15 and unindicted co-conspirators Richard Griego and UICC-3, arranged  
16 for heroin, methamphetamine and marijuana to be smuggled to UICC-3 in  
17 LACJ on behalf of DMM-1.

18       Overt Act No. 73:   On February 12, 2013, defendant RICHARD  
19 BAILEY packaged methamphetamine, heroin, and marijuana for unindicted  
20 co-conspirator Richard Griego to smuggle into LACJ.

21       Overt Act No. 74:   On February 28, 2013, unindicted co-  
22 conspirator Richard Griego possessed in his body and attempted to  
23 smuggle approximately 26.2 grams of pure methamphetamine,  
24 approximately 62.9 grams of heroin, and approximately 11.75 grams of  
25 marijuana into LACJ for UICC-3 and DMM-1.

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1 Assault of I.E. for Taking Mexican Mafia LACJ Enterprise Extortion  
2 Proceeds and for Cooperating with Law Enforcement

3 Overt Act No. 75: On March 15, 2013, unindicted co-  
4 conspirators assaulted I.E. at the direction of defendant VALENTIN  
5 CORDOVA.

6 Overt Act No. 76: On April 12, 2013, in a recorded telephone  
7 call, defendant VALENTIN CORDOVA reported to defendant CECILIA VIRGEN  
8 that he had ordered that I.E. be assaulted because I.E. had been  
9 taking Mexican Mafia LACJ Enterprise proceeds and had told LACJ  
10 deputies about a previous assault on him, so that defendant CECILIA  
11 VIRGEN could inform other facilities that I.E. should be assaulted.

12 Assault and Extortion of S.M.

13 Overt Act No. 77: Prior to March 21, 2013, defendant CECILIA  
14 VIRGEN ordered that S.M. be assaulted until he made a payment to the  
15 Mexican Mafia LACJ Enterprise.

16 Overt Act No. 78: On March 21, 2013, unindicted co-  
17 conspirators assaulted S.M. because of his bad standing with the  
18 Mexican Mafia LACJ Enterprise.

19 Assault of R.K. and Planned Assault of G.S. for Cooperating with Law  
20 Enforcement

21 Overt Act No. 79: On or before March 25, 2013, UICC-11 ordered  
22 that R.K. be assaulted because UICC-11 suspected that R.K. had  
23 cooperated with law enforcement.

24 Overt Act No. 80: On March 25, 2013, unindicted co-  
25 conspirators R.K. on UICC-11's orders because of R.K.'s suspected  
26 cooperation with law enforcement.

27 Overt Act No. 81: From April 6, 2013, through May 21, 2013,  
28 UICC-3 and defendant CECILIA VIRGEN discussed, in recorded telephone



1 calls, locating G.S. in order to have him assaulted as discipline for  
2 his suspected cooperation with law enforcement.

3 Assault of A.R. in Order to Commit Extortion

4 Overt Act No. 82: On March 31, 2013, defendant MARK LANDEROS  
5 and unindicted co-conspirator 25 ("UICC-25") assaulted A.R. because  
6 they believed A.R. was in LACJ for a sexual assault.

7 Assault and Extortion of J.M.-2

8 Overt Act No. 83: On or before April 2, 2013, defendant  
9 VALENTIN CORDOVA ordered the assault of J.M.-2 because J.M.-2 lied  
10 about his identity to the Mexican Mafia LACJ Enterprise.

11 Overt Act No. 84: On April 2, 2013, unindicted co-conspirators  
12 assaulted J.M.-2 because of his bad standing with the Mexican Mafia  
13 LACJ Enterprise.

14 Overt Act No. 85: On April 6, 2013, in a recorded telephone  
15 call, defendant CECILIA VIRGEN ordered that J.M.-2 be assaulted until  
16 he pays his debt to the Mexican Mafia LACJ Enterprise.

17 Extortion of J.M.-3

18 Overt Act No. 86: From April 6, 2013, through May 20, 2013, in  
19 recorded telephone conversations, defendant CECILIA VIRGEN spoke to  
20 UICC-3 and defendants VALENTIN CORDOVA and FRANKIE MEGORADO about  
21 finding J.M.-3 in LACJ to collect a debt that J.M.-3 owed to the  
22 Mexican Mafia LACJ Enterprise.

23 Overt Act No. 87: On April 6, 2013, in a recorded telephone  
24 conversation, defendant VALENTIN CORDOVA told defendant CECILIA  
25 VIRGEN he would look for J.M.-3.

26 Overt Act No. 88: On May 16, 2013, in a recorded telephone  
27 conversation, UICC-3 told defendant CECILIA VIRGEN that J.M.-3 had  
28 paid his debt to the Mexican Mafia.



1        Overt Act No. 89:    On May 19, 2013, in a recorded telephone  
2 conversation, defendant CECILIA VIRGEN told defendant FRANKIE  
3 MEGORADO that J.M.-3 still owed money to the Mexican Mafia, but that  
4 she was going to allow J.M.-3 to pay \$400 instead of \$600, and  
5 defendant FRANKIE MEGORADO provided J.M.-3's name and booking number  
6 to CECILIA VIRGEN so that he could be located.

7        Assault of Defendant MIGUEL GARCIA for not Remitting the Proper Drug  
8 and Extortion Proceeds

9        Overt Act No. 90:    From April 5, 2013, through April 12, 2013,  
10 in recorded telephone conversations, defendant CECILIA VIRGEN ordered  
11 defendant JOSE OLEA to assault defendant MIGUEL GARCIA and to replace  
12 defendant MIGUEL GARCIA as the shot-caller of the 700 floor of NCCF  
13 because defendant MIGUEL GARCIA had not been properly remitting  
14 extortion and drug proceeds and because defendant MIGUEL GARCIA's  
15 wife had disrespected defendant CECILIA VIRGEN during the dispute  
16 over the proceeds.

17        Overt Act No. 91:    On or before April 9, 2013, defendant JOSE  
18 OLEA ordered that defendant MIGUEL GARCIA be assaulted.

19        Overt Act No. 92:    On April 9, 2013, unidentified co-  
20 conspirators assaulted defendant MIGUEL GARCIA as directed by  
21 defendant JOSE OLEA.

22        Overt Act No. 93:    On April 10, 2013, in a recorded telephone  
23 conversation, defendant CECILIA VIRGEN directed defendant JOSE OLEA  
24 to continue assaulting defendant MIGUEL GARCIA until defendant MIGUEL  
25 GARCIA surrendered the roll calls, the address to which to send kitty  
26 and other money, phone numbers, and calling cards to defendant JOSE  
27 OLEA.

28        ///

1       Overt Act No. 94:   On April 12, 2013, after defendant JOSE OLEA  
2 told defendant CECILIA VIRGEN in a recorded telephone call that  
3 defendant MIGUEL GARCIA had complied, defendant CECILIA VIRGEN  
4 ordered that defendant MIGUEL GARCIA be assaulted until he left the  
5 700 floor of NCCF.

6       Overt Act No. 95:   On April 12, 2013, defendant JOSE OLEA  
7 arranged for defendant MIGUEL GARCIA to be assaulted again.

8       Overt Act No. 96:   On April 12, 2013, unidentified co-  
9 conspirators assaulted defendant MIGUEL GARCIA as directed by  
10 defendant JOSE OLEA.

11 Assault of L.M. for Attempting to Evade Extortion

12       Overt Act No. 97:   On April 23, 2013, Mark Martinez, Amo West,  
13 Ramiro Andrade, Oswaldo Quintero, Nicholas Escarcega, Christian  
14 Fuentes, Francisco Ruiz, and Jose Vera assaulted L.M. in order to  
15 maintain Mexican Mafia LACJ Enterprise discipline and punish L.M. for  
16 attempting to evade extortion.

17       Overt Act No. 98:   On April 23, 2013, unknown co-conspirators  
18 moved the unconscious body of L.M. in order to prevent the detection  
19 of the beating of L.M.

20       Overt Act No. 99:   On April 23, 2013, unindicted co-conspirator  
21 Ramiro Andrade and other unknown co-conspirators cleaned blood and  
22 other evidence of an assault from the location of the beating of L.M.  
23 to prevent the detection of the beating of L.M..

24 Assaults of J.V. and M.M.F.

25       Overt Act No. 100: On April 28, 2013, an unindicted co-  
26 conspirator assaulted J.V. for volunteering for and backing out of an  
27 agreed upon assault.

28 ///

1        Overt Act No. 101: On April 28, 2013, unindicted co-  
2 conspirators assaulted M.M.F. for violating a Mexican Mafia LACJ  
3 Enterprise rule against associating with African-American inmates.  
4 Laundering of Money from LACJ

5        Overt Act No. 102: On May 9, 2013, defendant DANIEL CERVANTES  
6 met with and gave the HSI UC approximately \$7,976 in money orders  
7 representing proceeds of Mexican Mafia LACJ Enterprise activities for  
8 the HSI UC to launder by negotiating the money orders in exchange for  
9 a fee.

10       Overt Act No. 103: On May 10, 2013, defendant DANIEL CERVANTES  
11 received from the ICE UC \$7,178 in cash representing proceeds from  
12 the negotiation of the money orders.

13 Possession of Methamphetamine and Mexican Mafia LACJ Enterprise  
14 Correspondence Regarding Extortion in LACJ

15       Overt Act No. 104: On May 13, 2013, in LACJ, defendant MICHAEL  
16 BENNETT possessed inside his body approximately 5.5 grams of  
17 methamphetamine, which he intended to give to UICC-1.

18       Overt Act No. 105: On May 13, 2013, defendant MICHAEL BENNETT  
19 carried a message regarding extortion and leadership within LACJ in  
20 his body from UICC-3 intended for UICC-1.

21       Overt Act No. 106: On May 13, 2013, UICC-3 reported to UICC-1  
22 that MCJ had paid \$1,500 in kitty money, that he had fined a Sureno  
23 \$600 and ordered that the Sureno be assaulted for losing drugs, and  
24 identified various other shot-callers within LACJ.

25 Possession of Cocaine and Methamphetamine and Correspondence Related  
26 to Drug Trafficking and Extortion

27       Overt Act No. 107: On May 15, 2013, in LACJ, defendant EDWIN  
28 AYALA possessed with the intent to distribute to others on behalf of

1 the Mexican Mafia LACJ Enterprise approximately .6 grams of cocaine  
2 base in the form of crack cocaine and approximately .54 grams of  
3 methamphetamine.

4 Overt Act No. 108: On May 15, 2013, defendant EDWIN AYALA  
5 possessed two kites from UICC-11 intended for UICC-3 and unindicted  
6 co-conspirator 27 ("UICC-27").

7 Conspiracy to Extort and Assault J.J.

8 Overt Act No. 109: On May 17, 2013, in a recorded telephone  
9 call, defendants CECILIA VIRGEN, FRANKIE MEGORADO, and VALENTIN  
10 CORDOVA discussed having J.J. assaulted for interfering with the  
11 orderly administration of Mexican Mafia LACJ Enterprise operations,  
12 including the handling of drug and extortion proceeds.

13 Overt Act No. 110: On May 20, 2013, in a recorded telephone  
14 call, defendant CECILIA VIRGEN directed defendant FRANKIE MEGORADO to  
15 arrange the assault of J.J. in order to maintain Mexican Mafia LACJ  
16 Enterprise discipline.

17 Overt Act No. 111: On May 20, 2013, in a recorded telephone  
18 call, defendant FRANKIE MEGORADO agreed to arrange the assault of  
19 J.J. as directed by defendant CECILIA VIRGEN.

20 Possession of Mexican Mafia LACJ Enterprise Records

21 Overt Act No. 112: On May 22, 2013, defendant CECILIA VIRGEN  
22 possessed records of the Mexican Mafia LACJ Enterprise's racketeering  
23 activities in LACJ, including drug trafficking and extortion.

24 Smuggling of Methamphetamine, Heroin and Marijuana into LACJ

25 Overt Act No. 113: From May 22, 2013, through May 30, 2013, in  
26 recorded telephone conversations, UICC-10 and defendant ANA MARTINEZ  
27 coordinated the smuggling of heroin, methamphetamine, and marijuana  
28 to UICC-3 in LACJ; UICC-10 directed defendant ANA MARTINEZ to mark

1 the drugs with "Kahn" to indicate that they were for UICC-3; and  
2 UICC-10 directed defendant ANA MARTINEZ to package the drugs in the  
3 cutoff fingers of black latex gloves.

4 Overt Act No. 114: On May 23, 2013, defendant ANA MARTINEZ  
5 obtained heroin, methamphetamine, and marijuana from an unknown  
6 supplier and packaged the drugs for smuggling into LACJ.

7 Overt Act No. 115: From May 2013 through August 7, 2013,  
8 defendant ANA MARTINEZ possessed digital scales and narcotics  
9 packaging to facilitate the smuggling of drugs into LACJ on behalf of  
10 the Mexican Mafia LACJ Enterprise.

11 Money Laundering

12 Overt Act No. 116: On May 24, 2013, in a recorded telephone  
13 conversation, UICC-10 directed defendant ANA MARTINEZ to transfer  
14 \$500 of Mexican Mafia LACJ Enterprise drug money to defendant VALERIE  
15 TREJO.

16 Overt Act No. 117: On May 24, 2013, defendant ANA MARTINEZ  
17 transferred \$500 of Mexican Mafia LACJ Enterprise drug money to  
18 defendant VALERIE TREJO via money order.

19 Identity Theft and Access Device Fraud

20 Overt Act No. 118: From May 2013 through at least August 2013,  
21 defendant ANA MARTINEZ obtained identity profiles, opened fraudulent  
22 Verizon phone accounts based on those profiles, and provided those  
23 phone numbers to UICC-10 to give to other Mexican Mafia LACJ  
24 Enterprise associates so that they could carry out Mexican Mafia LACJ  
25 Enterprise business by making free phone calls.

26 Overt Act No. 119: On August 7, 2013, defendant ANA MARTINEZ  
27 possessed in her residence hundreds of stolen identity profiles to

28 ///

1 use to open fraudulent phone accounts to further Mexican Mafia LACJ  
2 Enterprise communications to and from LACJ.

3 Defendant JOSE LANDA-RODRIGUEZ takes over Mexican Mafia LACJ  
4 Enterprise Operations, Including Drug Trafficking and Extortion

5 Overt Act No. 120: Beginning on June 21, 2013, following the  
6 death of DMM-1, defendant JOSE LANDA-RODRIGUEZ took over all Mexican  
7 Mafia LACJ Enterprise operations within LACJ.

8 Overt Act No. 121: Beginning June 21, 2013, following the death  
9 of DMM-1, UICC-9 assumed a position as a top lieutenant to defendant  
10 JOSE LANDA-RODRIGUEZ for running Mexican Mafia LACJ Enterprise  
11 operations in LACJ.

12 Overt Act No. 122: Beginning June 21, 2013, following the death  
13 of DMM-1, defendant MIGUEL CALDERON assumed a position as an out-of-  
14 custody "secretary" for defendant JOSE LANDA-RODRIGUEZ to facilitate  
15 Mexican Mafia LACJ Enterprise operations in LACJ.

16 Overt Act No. 123: Beginning June 21, 2013, following the death  
17 of DMM-1, UICC-4 took over as the shot-caller of the 800 and 900  
18 dorms in NCCF to run Mexican Mafia LACJ Enterprise operations for  
19 defendant JOSE LANDA-RODRIGUEZ.

20 Overt Act No. 124: Beginning June 26, 2013, following the death  
21 of DMM-1, defendant MIGUEL GARCIA took over as the shot-caller of the  
22 500, 600, and 700 dorms in NCCF to run Mexican Mafia LACJ Enterprise  
23 operations for defendant JOSE LANDA-RODRIGUEZ.

24 Overt Act No. 125: On June 24, 2013, defendant JOSE LANDA-  
25 RODRIGUEZ told defendant SAMANTHA RIVERA that he was taking over all  
26 of LACJ and directed defendant SAMANTHA RIVERA to inform defendant  
27 MIGUEL CALDERON.

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1        Overt Act No. 126: From June 24, 2013, through at least  
2 December 18, 2015, defendant SAMANTHA RIVERA passed communications  
3 from defendant JOSE LANDA-RODRIGUEZ to other Mexican Mafia members.

4        Overt Act No. 127: On June 28, 2013, defendant MIGUEL CALDERON  
5 directed UICC-9 to send the kitty money to a post office box that he  
6 controlled and to send the drug and fine money to another post office  
7 box that he controlled.

8        Overt Act No. 128: On June 23, 2013, July 6, 2013, and July 26,  
9 2013, defendant MIGUEL CALDERON made deposits of approximately \$200  
10 in kitty proceeds into the LACJ inmate trust account of defendant  
11 JOSE LANDA-RODRIGUEZ.

12 Smuggling of Methamphetamine into LACJ

13        Overt Act No. 129: From July 24, 2013, through August 14, 2013,  
14 defendant MARK LANDEROS and unindicted co-conspirators Kristen Ayala,  
15 Jonathan Rodriguez, Bryanna McCullah, Juan NMN Garcia, and unindicted  
16 co-conspirator 31 ("UICC-31") arranged to smuggle approximately one  
17 ounce of methamphetamine and one ounce of marijuana into LACJ.

18        Overt Act No. 130: On July 25, 2013, in a recorded telephone  
19 conversation, defendant MARK LANDEROS asked UICC-31 to smuggle drugs  
20 into LACJ.

21        Overt Act No. 131: On August 3, 2013, in a recorded telephone  
22 conversation between defendant MARK LANDEROS and unindicted co-  
23 conspirators Kristen Ayala and Juan NMN Garcia, defendant MARK  
24 LANDEROS asked unindicted co-conspirator Juan NMN Garcia to supply  
25 methamphetamine and marijuana, and unindicted co-conspirator Juan NMN  
26 Garcia agreed to do so and gave prices for the drugs.

27        Overt Act No. 132: On August 13, 2013, in a recorded telephone  
28 conversation, defendant MARK LANDEROS spoke to unindicted co-



1 conspirator Jonathan Rodriguez and gave him instructions regarding  
2 the drugs to be smuggled into LACJ.

3 Overt Act No. 133: On August 14, 2013, acting on defendant MARK  
4 LANDEROS' instructions, unindicted co-conspirator Jonathan Rodriguez  
5 attempted to smuggle into LACJ approximately 22.7 grams of  
6 methamphetamine inside his body.

7 JUAN REYES Appointed as Shot-Caller for 800 Floor of NCCF

8 Overt Act No. 134: On or before August 7, 2013, defendant  
9 FRANKIE MEGORADO sent a kite to defendant JUAN REYES appointing  
10 defendant JUAN REYES as shot-caller for the 800 floor of MCJ on  
11 behalf of the Mexican Mafia LACJ Enterprise, and providing  
12 instructions regarding extortion and discipline.

13 Smuggling of Heroin within LACJ

14 Overt Act No. 135: On September 24, 2013, unindicted co-  
15 conspirator 32 ("UICC-32") attempted to smuggle .39 grams of heroin  
16 from Twin Towers to defendant MIGUEL GARCIA at NCCF.

17 LAUREEN GARCIA Acts as the Secretary for NCCF and MANUEL JIMENEZ Acts  
18 as a Shot-Caller for NCCF by imposing Discipline and Collecting  
19 Extortion Proceeds and Laundering Them

20 Overt Act No. 136: In October 2013, defendant LAUREEN GARCIA  
21 served as the Mexican Mafia LACJ Enterprise secretary for NCCF and in  
22 that capacity ordered assaults as discipline and for violations of  
23 Mexican Mafia rules, collected "Green Dot" numbers representing  
24 proceeds from Mexican Mafia LACJ Enterprise extortion activities from  
25 defendant MANUEL JIMENEZ, and directed defendant MANUEL JIMENEZ to  
26 send extortion money to a post office box that defendant LAUREEN  
27 GARCIA controlled.

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1       Overt Act No. 137: On October 3, 2013, in a recorded telephone  
2 conversation, defendant LAUREEN GARCIA appointed MANUEL JIMENEZ and  
3 an unindicted co-conspirator known as "Fatboy" from the Blythe Street  
4 gang to run Mexican Mafia LACJ Enterprise activities in parts of  
5 NCCF.

6       Overt Act No. 138: On October 7, 2013, in a recorded telephone  
7 conversation, defendant MANUEL JIMENEZ provided to defendant LAUREEN  
8 GARCIA the number to a Green Dot card/account that contained \$100 in  
9 Mexican Mafia LACJ Enterprise proceeds.

10       Overt Act No. 139: On October 11, 2013, in a recorded telephone  
11 conversation, defendant LAUREEN GARCIA gave the post office box  
12 address for kitty money to defendant MANUEL JIMENEZ.

13       Overt Act No. 140: On October 12, 2013, in a recorded telephone  
14 conversation, defendant LAUREEN GARCIA ordered defendant ALAVARO  
15 LEYVA to fine a Sureno known as "Oso" \$600 for violating Mexican  
16 Mafia LACJ Enterprise rules.

17       Overt Act No. 141: On October 12, 2013, in a recorded telephone  
18 conversation, defendant ALAVARO LEYVA told defendant LAUREEN GARCIA  
19 that he would fine the Sureno known as "Oso" \$600 and have him  
20 assaulted three times for 39 seconds, and defendant LAUREEN GARCIA  
21 agreed.

22       Overt Act No. 142: On October 14, 2013, in a recorded telephone  
23 conversation, defendant LAUREEN GARCIA gave the post office box  
24 address for kitty money to defendant ALAVARO LEYVA.

25       Overt Act No. 143: On October 14, 2013, in a recorded telephone  
26 conversation, defendant ALAVARO LEYVA told defendant LAUREEN GARCIA  
27 about inmates in NCCF who were causing problems and suggested that  
28 they be fined \$1,000.

1        Overt Act No. 144: On October 14, 2013, in a recorded telephone  
2 conversation, defendant LAUREEN GARCIA agreed to the \$1,000 fines for  
3 Oso and other inmates who were causing problems in NCCF and ordered  
4 that they be assaulted as well.

5        Overt Act No. 145: On October 27, 2013, defendant LAUREEN  
6 GARCIA put \$50 on the inmate trust account of defendant JOSE LANDA-  
7 RODRIGUEZ.

8        Overt Act No. 146: On November 1, 2013, defendant LAUREEN  
9 GARCIA possessed sixty-seven money orders representing \$3,240 in  
10 Mexican Mafia LACJ Enterprise proceeds.

11        Assault of FRANKIE MEGORADO for Failing to Run Mexican Mafia LACJ  
12 Enterprise Drug Trafficking and Extortion, Properly

13        Overt Act No. 147: On or before October 2, 2013, in a recorded  
14 telephone conversation, defendant ALVARO LEYVA told defendant  
15 LAUREEN GARCIA that defendant FRANKIE MEGORADO should be assaulted  
16 because he was not running Mexican Mafia LACJ Enterprise operations  
17 properly, including by not remitting the proper amount of drug and  
18 extortion proceeds.

19        Overt Act No. 148: On October 2, 2013, in a recorded telephone  
20 conversation, defendant LAUREEN GARCIA ordered defendant ALVARO  
21 LEYVA to have defendant FRANKIE MEGORADO assaulted because he was not  
22 running Mexican Mafia LACJ Enterprise operations properly.

23        Overt Act No. 149: On or after October 2, 2013, defendant  
24 ALVARO LEYVA ordered that defendant FRANKIE MEGORADO be assaulted.

25        Overt Act No. 150: On October 5, 2013, unindicted co-  
26 conspirators assaulted defendant FRANKIE MEGORADO.

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1 Greenlighting of Rafael Carrillo

2 Overt Act No. 151: On or before October 10, 2013, defendant  
3 JOSE LANDA-RODRIGUEZ ordered that UICC-1 be seriously assaulted for  
4 undermining defendant GILBERT PARRA'S authority to collect extortion  
5 and proceeds.

6 Overt Act No. 152: On October 10, 2013, defendant GILBERT PARRA  
7 passed on defendant JOSE LANDA-RODRIGUEZ' order that UICC-1 be  
8 seriously assaulted to maintain the efficiency of the Mexican Mafia  
9 LACJ Enterprise's extortion and drug trafficking activities.

10 Overt Act No. 153: On October 14, 2013, defendant GILBERT PARRA  
11 attempted to pass on to NCCF orders that UICC-1 be seriously  
12 assaulted.

13 Overt Act No. 154: On October 14, 2013, UICC-9 attempted to  
14 smuggle into NCCF kites containing orders and instructions from  
15 defendants GILBERT PARRA and JOSE LANDA-RODRIGUEZ.

16 Conspiracy to Assault J.J. for Interfering with Drug Trafficking and  
17 Extortion

18 Overt Act No. 155: From October 10, 2013 through October 21,  
19 2013, defendants JOSE LANDA-RODRIGUEZ and ERNESTO VARGAS ordered that  
20 J.J. be assaulted for undermining defendant MIGUEL GARCIA's authority  
21 to collect extortion and drug proceeds.

22 Overt Act No. 156: On or before October 23, 2013, Juan Jimenez  
23 was assaulted on the orders of defendant ERNESTO VARGAS in order to  
24 maintain the efficiency of Mexican Mafia LACJ Enterprise extortion  
25 and drug trafficking activities.

26 Overt Act No. 157: On October 23, 2013, in a recorded telephone  
27 conversation, defendants ERNESTO VARGAS and MIGUEL GARCIA discussed  
28 unindicted co-conspirator J.J.'s assault as discipline for

1 questioning defendant MIGUEL GARCIA's status in the Mexican Mafia  
2 LACJ Enterprise.

3 JONATHAN VERDEJA Facilitates Mexican Mafia LACJ Enterprise Activities  
4 at NCCF Including Drug Trafficking, Extortion, and Related Money  
5 Laundering

6 Overt Act No. 158: From about October 16, 2013, through  
7 December 26, 2013, defendant JONATHAN VERDEJA acted as the  
8 facilitator for NCCF on behalf of the Mexican Mafia LACJ Enterprise;  
9 defendant JONATHAN VERDEJA coordinated and collected kitty money and  
10 oversaw the distribution of drugs in NCCF.

11 Overt Act No. 159: On October 17, 2013, in recorded telephone  
12 conversations, defendant JONATHAN VERDEJA called unindicted co-  
13 conspirator 33 ("UICC-33"), who gave the post office box address for  
14 Mexican Mafia LACJ Enterprise money and payments to defendant  
15 JONATHAN VERDEJA, and defendant JONATHAN VERDEJA agreed to send the  
16 payments to that address and directed UICC-33 to pass messages  
17 through defendant JONATHAN VERDEJA's secretary, unindicted co-  
18 conspirator 34 ("UICC-34").

19 Overt Act No. 160: On October 18, 2013, in a recorded telephone  
20 conversation, defendant JONATHAN VERDEJA told UICC-34 to open a post  
21 office box, told UICC-34 that he will send kitty money to her, and  
22 told UICC-34 to put the money on his inmate trust account.

23 Overt Act No. 161: On October 19, 2013, in a recorded telephone  
24 conversation, defendant JONATHAN VERDEJA told UICC-34 to give the  
25 post office box address to NCCF shot-callers who will be calling her.

26 Overt Act No. 162: On October 22, 2013, in a recorded telephone  
27 conversation, defendant JONATHAN VERDEJA told UICC-34 how to instruct  
28 NCCF shot-callers to properly fill out money orders.

1       Overt Act No. 163: On October 29, 2013, in a recorded telephone  
2 conversation, defendant JONATHAN VERDEJA told UICC-34 to give the  
3 post office box address to "Greedy" and "Laughing Boy;" UICC-34 told  
4 defendant JONATHAN VERDEJA that she had already received one money  
5 order, that she was unhappy that her name was on it, and that she  
6 preferred to deal in Green Dot numbers.

7       Overt Act No. 164: On October 30, 2013, in a recorded telephone  
8 conversation, defendant JONATHAN VERDEJA told UICC-34 that she will  
9 be receiving twenty-eight money orders representing proceeds of  
10 Mexican Mafia LACJ Enterprise activities.

11       Overt Act No. 165: On November 10, 2013, in a recorded  
12 telephone conversation, UICC-34 told defendant JONATHAN VERDEJA that  
13 she had received kitty payments from dorms 822 and 823, and defendant  
14 JONATHAN VERDEJA told her to cash them.

15       Overt Act No. 166: On November 15, 2013, in a recorded  
16 telephone conversation, an unidentified female co-conspirator told  
17 defendant JONATHAN VERDEJA that she had eight money orders  
18 representing Mexican Mafia LACJ Enterprise proceeds and defendant  
19 JONATHAN VERDEJA told the unidentified female co-conspirator to keep  
20 two for herself and he would tell her what to do with the rest.

21       Overt Act No. 167: On November 19, 2013, in a recorded  
22 telephone conversation, defendant JONATHAN VERDEJA told unindicted  
23 co-conspirator 35 ("UICC-35") that more money orders will be sent and  
24 that they are important.

25       Overt Act No. 168: On November 21, 2013, in a recorded  
26 telephone conversation, defendant JONATHAN VERDEJA reported on how  
27 things were going at NCCF to defendant GILBERT PARRA and told  
28 ///

1 unindicted co-conspirator 36 ("UICC-36") to give money orders to  
2 defendant GILBERT PARRA.

3 Overt Act No. 169: On December 1, 2013, in a recorded telephone  
4 conversation, defendant JONATHAN VERDEJA told UICC-35 that she will  
5 be receiving more Green Dot numbers and UICC-35 told defendant  
6 JONATHAN VERDEJA that she had five Green Dot numbers and one money  
7 order.

8 Overt Act No. 170: On December 4, 2013, in a recorded telephone  
9 conversation, UICC-35 told defendant JONATHAN VERDEJA that she had  
10 one Green Dot number, five money orders, and one money-gram and that  
11 her Green Dot account had been frozen for potential money laundering.

12 Overt Act No. 171: On December 8, 2013, in a recorded telephone  
13 conversation, UICC-35 reported to defendant JONATHAN VERDEJA that she  
14 had ten money orders and one money-gram and defendant JONATHAN  
15 VERDEJA told her to give them to an unidentified co-conspirator.

16 Overt Act No. 172: On December 9, 2013, in a recorded telephone  
17 conversation, UICC-36 reported to defendant JONATHAN VERDEJA that she  
18 had twenty money orders and defendant JONATHAN VERDEJA told UICC-36  
19 to keep one for herself and give the rest to UICC-35.

20 Overt Act No. 173: On December 9, 2013, in a recorded telephone  
21 conversation, defendant JONATHAN VERDEJA told UICC-35 to get nineteen  
22 money orders from UICC-36 and to give them to defendant GILBERT  
23 PARRA.

24 Conspiracy to Assault G.S.

25 Overt Act No. 174: On October 20, 2013, in a recorded telephone  
26 conversation, defendant LAUREEN GARCIA ordered that G.S. be assaulted  
27 for mentioning defendant JOSE LANDA-RODRIGUEZ' name too much.

1 Possession of Heroin and Mexican Mafia LACJ Enterprise Correspondence  
2 within LACJ

3 Overt Act No. 175: On November 5, 2013, an UICC-2 gave six  
4 doses of heroin that was prepackaged for sale to unindicted co-  
5 conspirator 37 ("UICC-37") to sell to other persons inside LACJ.

6 Overt Act No. 176: On November 5, 2013, UICC-37 possessed six  
7 doses of heroin that was prepackaged for sale with intent to sell it  
8 to other persons inside LACJ.

9 Overt Act No. 177: On November 5, 2013, UICC-37 transported a  
10 kite written by defendant MARK LANDEROS, containing instructions that  
11 defendant LUIS GARCIA was the facilitator for defendant JOSE LANDA-  
12 RODRIGUEZ for MCJ and Twin Towers, his orders were to be respected,  
13 and anyone expressing disobedience to him should be assaulted for 39  
14 seconds.

15 Possession of Mexican Mafia LACJ Enterprise Correspondence Related to  
16 Drug Trafficking and Extortion

17 Overt Act No. 178: On December 4, 2013, defendant LUIS GARCIA  
18 possessed kites directing the activities of the Mexican Mafia LACJ  
19 Enterprise inside LACJ, including drug trafficking and Extortion.

20 Assault of UICC-32 for Losing Mexican Mafia LACJ Enterprise Heroin

21 Overt Act No. 179: On or before October 1, 2013, defendant  
22 MIGUEL GARCIA ordered that UICC-32 be assaulted as discipline for  
23 losing heroin that belonged to the Mexican Mafia LACJ Enterprise.

24 Overt Act No. 180: On October 1, 2013, in a recorded telephone  
25 conversation, defendant LAUREEN GARCIA passed on to defendant MANUEL  
26 JIMENEZ defendant MIGUEL GARCIA's order that UICC-32 be assaulted  
27 inside LACJ as discipline for losing the heroin he had attempted to  
28 smuggle into NCCF.



1       Overt Act No. 181: On or after October 1, 2013, defendant  
2 MANUEL JIMENEZ passed along the order to assault UICC-32.

3       Overt Act No. 182: On December 5, 2013, unindicted co-  
4 conspirators assaulted UICC-32.

5 Assault of O.A. for Failing to Conduct Mexican Mafia LACJ Enterprise  
6 Operations, Including Drug Trafficking and Extortion, Properly

7       Overt Act No. 183: On or before December 12, 2013, defendant  
8 LUIS GARCIA ordered that O.A. be assaulted and replaced as a shot-  
9 caller.

10       Overt Act No. 184: On December 12, 2013, unindicted co-  
11 conspirators assaulted O.A. to remove him as a shot-caller.

12 Possession of Heroin Within LACJ and Extortion

13       Overt Act No. 185: On or before December 18, 2013, UICC-2  
14 arranged for approximately 43.7 grams of heroin to be given to  
15 unindicted co-conspirator Jonathan Rodriguez to smuggle into Twin  
16 Towers for UICC-2 and defendant LUIS GARCIA.

17       Overt Act No. 186: On December 18, 2013, unindicted co-  
18 conspirator Jonathan Rodriguez possessed approximately 43.7 grams of  
19 heroin with intent to distribute it to others on behalf of defendant  
20 JOSE LANDA-RODRIGUEZ.

21       Overt Act No. 187: On or before January 30, 2014, UICC-2 wrote  
22 a kite to defendant MARK LANDEROS to explain that unindicted co-  
23 conspirator Jonathan Rodriguez had been fined \$5,000 and would have  
24 to smuggle more drugs into LACJ because he lost the heroin seized  
25 from him on December 18, 2013, and that another Sureno had lost  
26 thirds in the form of two grams of methamphetamine.

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1 Possession of Mexican Mafia LACJ Enterprise Material

2 Overt Act No. 188: On January 31, 2014, defendant LUIS GARCIA  
3 possessed a razor blade, two pens, and contact information for  
4 defendants JOSE LANDA-RODRIGUEZ and SAMANTHA RIVERA and others.

5 Defendant GABRIEL ZENDEJAS-CHAVEZ Hosts an Eme Meeting at his Law  
6 Office

7 Overt Act No. 189: On February 4, 2014, defendant GABRIEL  
8 ZENDEJAS-CHAVEZ met with defendants RAFAEL LEMUS and MIGUEL  
9 RODRIGUEZ, DMM-2, and others in defendant GABRIEL ZENDEJAS-CHAVEZ'  
10 law office to discuss Eme business, including the passing of messages  
11 to Eme members in California State Prison by defendant GABRIEL  
12 ZENDEJAS-CHAVEZ, the passing of messages to defendant JOSE LANDA-  
13 RODRIGUEZ, obtaining drugs for DMM-2 to have sold, and problems La  
14 Eme was having with A.E., an Eme member in bad standing, and his  
15 brother G.E.

16 Possession of Mexican Mafia LACJ Correspondence

17 Overt Act No. 190: On February 17, 2014, defendant LUIS GARCIA  
18 possessed kites that discussed Mexican Mafia sanctioned assaults, the  
19 identity of Mexican Mafia LACJ Enterprise leaders within LACJ, and  
20 reflected that defendant LUIS GARCIA was the highest ranking  
21 shotcaller in LACJ for defendant JOSE LANDA-RODRIGUEZ.

22 Defendant GABRIEL ZENDEJAS-CHAVEZ Uses His Status as an Attorney to  
23 Meet With and Pass Messages to Mexican Mafia Members in Pelican Bay  
24 State Prison

25 Overt Act No. 191: On February 18, 2014, defendant GABRIEL  
26 ZENDEJAS-CHAVEZ used his status as an attorney to visit and pass  
27 messages to Mexican Mafia member 1, Mexican Mafia member 2, Mexican  
28 Mafia member 3, Mexican Mafia member 4, and Mexican Mafia member 5.

1        Overt Act No. 192: On February 18, 2014, defendant GABRIEL  
2 ZENDEJAS-CHAVEZ attempted to smuggle a written message to a Mexican  
3 Mafia member at the Security Housing Unit at Pelican Bay State  
4 Prison.

5        Overt Act No. 193: On February 19, 2014, defendant GABRIEL  
6 ZENDEJAS-CHAVEZ used his status as an attorney to visit and pass  
7 messages to Mexican Mafia member 6, Mexican Mafia member 7, Mexican  
8 Mafia member 8, Mexican Mafia member 9, and Mexican Mafia member 10.  
9 Attorney GABRIEL ZENDEJAS-CHAVEZ and UICC-38 Discuss Collecting and  
10 Laundering Mexican Mafia LACJ Enterprise Proceeds

11        Overt Act No. 194: On March 27, 2014, defendant GABRIEL  
12 ZENDEJAS-CHAVEZ, via text-message, directed UICC-38 to bring kitty  
13 proceeds to his law office.

14        Overt Act No. 195: On April 9, 2014, defendant GABRIEL  
15 ZENDEJAS-CHAVEZ, via text-message, directed UICC-38 to send him  
16 \$1,000.

17        Overt Act No. 196: On April 9, 2014, defendant GABRIEL  
18 ZENDEJAS-CHAVEZ, via text-message, agreed to deliver \$300 to each of  
19 two Mexican Mafia members at the ADX Florence federal prison in  
20 Colorado.

21        Overt Act No. 197: On April 10, 2014, defendant GABRIEL  
22 ZENDEJAS-CHAVEZ exchanged text messages with UICC-38 in which he  
23 agreed to deliver \$400 to two persons in Colorado and to keep \$200  
24 for himself.

25        Overt Act No. 198: On April 12, 2014, defendant GABRIEL  
26 ZENDEJAS-CHAVEZ travelled to the ADX Florence federal prison in  
27 Colorado to visit Mexican Mafia member 11.

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1       Overt Act No. 199: On April 14, 2014, defendant GABRIEL  
2 ZENDEJAS-CHAVEZ, via text-message, provided defendant DONATO  
3 GONZALES' name and booking number to UICC-38 so she could forward  
4 Mexican Mafia LACJ Enterprise proceeds to defendant DONATO GONZALES.

5       Overt Act No. 200: On April 18, 2014, defendant GABRIEL  
6 ZENDEJAS-CHAVEZ told UICC-38 that he had money to return to her  
7 because one of the Mexican Mafia members in Colorado could not have  
8 visitors.

9       Defendant GABRIEL ZENDEJAS-CHAVEZ Facilitates the Extortion of the  
10 Mongols Outlaw Motorcycle Gang and the Intimidation of a Victim of a  
11 Jail Stabbing

12       Overt Act No. 201: On April 8, 2014, defendant GABRIEL  
13 ZENDEJAS-CHAVEZ used his status as an attorney to meet defendant LUIS  
14 GARCIA and discuss Mexican Mafia business including the Mexican  
15 Mafia's extortion of the Mongols outlaw motorcycle gang and that they  
16 would be extorting the Mongols outlaw motorcycle gang for \$100,000.

17       Overt Act No. 202: On April 8, 2014, defendant GABRIEL  
18 ZENDEJAS-CHAVEZ agreed to travel to Pelican Bay State Prison on June  
19 25, 2014, to get support for the extortion proposal from other  
20 Mexican Mafia members.

21       Overt Act No. 203: On April 8, 2014, defendant GABRIEL  
22 ZENDEJAS-CHAVEZ agreed to contact unindicted co-conspirator 39  
23 ("UICC-39") to tell defendant LUIS GARCIA's stabbing victim, M.A.,  
24 not to cooperate with law enforcement in exchange for being taken off  
25 the "Green Light" list.

26       Overt Act No. 204: On April 8, 2014, defendant GABRIEL  
27 ZENDEJAS-CHAVEZ explained to defendant LUIS GARCIA how to use the

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1 legal system to delay his trial in order to remain in LACJ as a  
2 facilitator.

3 Overt Act No. 205: On April 9, 2014, defendant GABRIEL  
4 ZENDEJAS-CHAVEZ, via text-message, directed UICC-38 to send him  
5 \$1,000 and UICC-39's phone number per the instructions of defendant  
6 LUIS GARCIA.

7 Overt Act No. 206: On April 23, 2014, via text-message, UICC-38  
8 sent defendant GABRIEL ZENDEJAS-CHAVEZ a phone number for the  
9 national president of the Mongols outlaw motorcycle gang.

10 Overt Act No. 207: On June 25, 2014, defendant GABRIEL  
11 ZENDEJAS-CHAVEZ used his status as an attorney to meet with and pass  
12 messages to Mexican Mafia member 1, Mexican Mafia member 4, Mexican  
13 Mafia member 6, Mexican Mafia member 8, and Mexican Mafia member 10  
14 at Pelican Bay State Prison.

15 Possession of Mexican Mafia LACJ Enterprise Correspondence Discussing  
16 Drug Trafficking and Extortion

17 Overt Act No. 208: On April 14, 2014, defendant LUIS GARCIA  
18 possessed in his cell in LACJ two razor blades, a syringe, and more  
19 than 100 kites discussing Mexican Mafia LACJ Enterprise business,  
20 including: (1) defendant LUIS GARCIA's status as the highest ranking  
21 shot-caller in LACJ; (2) the smuggling of drugs into LACJ; (3) the  
22 thirds tax; (4) Green Dot numbers reflecting Mexican Mafia LACJ  
23 Enterprise proceeds; and (5) a request from defendant ALVINO MUNOZ  
24 that he be allowed to play a larger role in the smuggling of drugs  
25 into LACJ on behalf of the Mexican Mafia LACJ Enterprise.

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1 Defendant MARK LANDEROS Collects Thirds Taxes

2 Overt Act No. 209: On February 13, 2014, defendant MARK  
3 LANDEROS taxed R.H. the amount of approximately one-third of R.H.'s  
4 drugs for the right to sell the remainder in LACJ.

5 Overt Act No. 210: On February 14, 2014, defendant MARK  
6 LANDEROS taxed J.B. the amount of approximately one-third of J.B.'s  
7 drugs for the right to sell the remainder in LACJ.

8 Overt Act No. 211: On February 14, 2014, defendant MARK  
9 LANDEROS taxed U.R. the amount of approximately one-third of U.R.'s  
10 drugs for the right to sell the remainder in LACJ.

11 Overt Act No. 212: On February 18, 2014, defendant MARK  
12 LANDEROS taxed M.V. the amount of approximately one-third of M.V.'s  
13 drugs for the right to sell the remainder in LACJ.

14 Overt Act No. 213: On March 1, 2014, defendant MARK LANDEROS  
15 taxed L.M. the amount of approximately one-third of L.M.'s drugs for  
16 the right to sell the remainder in LACJ.

17 Overt Act No. 214: On March 2, 2014, defendant MARK LANDEROS  
18 taxed P.C.-2 the amount of approximately one-third of P.C.-2's drugs  
19 for the right to sell the remainder in LACJ.

20 Overt Act No. 215: On March 9, 2014, defendant MARK LANDEROS  
21 taxed G.P. the amount of approximately one-third of G.P.'s drugs for  
22 the right to sell the remainder in LACJ.

23 Overt Act No. 216: On March 9, 2014, defendant MARK LANDEROS  
24 accepted drugs that were confiscated by an unidentified unindicted  
25 co-conspirator from a Sureno who did not pay the thirds tax.

26 Overt Act No. 217: On March 10, 2014, defendant MARK LANDEROS  
27 taxed G.M. the amount of approximately one-third of G.M.' drugs for  
28 the right to sell the remainder in LACJ.

1        Overt Act No. 218: On March 11, 2014, defendant MARK LANDEROS  
2        taxed J.G. the amount of approximately one-third of J.G.'s drugs for  
3        the right to sell the remainder in LACJ.

4        Overt Act No. 219: On March 11, 2014, defendant MARK LANDEROS  
5        taxed N.G. the amount of approximately one-third of N.G.'s drugs for  
6        the right to sell the remainder in LACJ.

7        Overt Act No. 220: On March 13, 2014, defendant MARK LANDEROS  
8        taxed J.S.-2 the amount of approximately one-third of J.S.-2's drugs  
9        for the right to sell the remainder in LACJ.

10       Overt Act No. 221: On March 15, 2014, defendant MARK LANDEROS  
11       taxed R.V. the amount of approximately one-third of R.V.'s drugs for  
12       the right to sell the remainder in LACJ.

13       Overt Act No. 222: On March 16, 2014, defendant MARK LANDEROS  
14       taxed D.A. the amount of approximately one-third of D.A.'s drugs for  
15       the right to sell the remainder in LACJ.

16       Overt Act No. 223: On March 17, 2014, defendant MARK LANDEROS  
17       taxed R.R. the amount of approximately one-third of R.R.'s drugs for  
18       the right to sell the remainder in LACJ.

19       Overt Act No. 224: On March 19, 2014, defendant MARK LANDEROS  
20       taxed H.G. the amount of approximately one-third of H.G.'s drugs for  
21       the right to sell the remainder in LACJ.

22       Overt Act No. 225: On March 19, 2014, defendant MARK LANDEROS  
23       taxed D.A. the amount of approximately one-third of D.A.'s drugs for  
24       the right to sell the remainder in LACJ.

25       Overt Act No. 226: On March 23, 2014, defendant MARK LANDEROS  
26       taxed M.M. the amount of approximately one-third of M.M.'s drugs for  
27       the right to sell the remainder in LACJ.

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1       Overt Act No. 227: On March 25, 2014, defendant MARK LANDEROS  
2 taxed J.E. the amount of approximately one-third of J.E.'s drugs for  
3 the right to sell the remainder in LACJ.

4       Overt Act No. 228: On March 25, 2014, defendant MARK LANDEROS  
5 taxed J.A. the amount of approximately one-third of J.A.'s drugs for  
6 the right to sell the remainder in LACJ.

7       Overt Act No. 229: On April 4, 2014, defendant MARK LANDEROS  
8 taxed J.M.-4 the amount of approximately one-third of J.M.-4's drugs  
9 for the right to sell the remainder in LACJ.

10       Overt Act No. 230: On April 8, 2014, defendant MARK LANDEROS  
11 taxed J.S.-2 the amount of approximately one-third of J.S.-2's drugs  
12 for the right to sell the remainder in LACJ.

13       Overt Act No. 231: On April 8, 2014, defendant MARK LANDEROS  
14 taxed J.H. the amount of approximately one-third of J.H.'s drugs for  
15 the right to sell the remainder in LACJ.

16       Overt Act No. 232: On April 13, 2014, defendant MARK LANDEROS  
17 taxed R.O. the amount of approximately one-third of R.O.'s drugs for  
18 the right to sell the remainder in LACJ.

19       Overt Act No. 233: On April 14, 2014, defendant MARK LANDEROS  
20 taxed L.O. the amount of approximately one-third of L.O.'s drugs for  
21 the right to sell the remainder in LACJ.

22       Overt Act No. 234: On April 15, 2014, defendant MARK LANDEROS  
23 taxed J.P. the amount of approximately one-third of J.P.'s drugs for  
24 the right to sell the remainder in LACJ.

25       Overt Act No. 235: On April 16, 2014, defendant MARK LANDEROS  
26 taxed F.M. the amount of approximately one-third of F.M.'s drugs for  
27 the right to sell the remainder in LACJ.

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1        Overt Act No. 236: On April 16, 2014, defendant MARK LANDEROS  
2 taxed M.G. the amount of approximately one-third of M.G.'s drugs for  
3 the right to sell the remainder in LACJ.

4        Overt Act No. 237: On April 17, 2014, defendant MARK LANDEROS  
5 taxed S.M. the amount of approximately one-third of S.M.'s drugs for  
6 the right to sell the remainder in LACJ.

7        Overt Act No. 238: On April 18, 2014, defendant MARK LANDEROS  
8 taxed R.E. the amount of approximately one-third of R.E.'s drugs for  
9 the right to sell the remainder in LACJ.

10       Overt Act No. 239: On April 22, 2014, defendant MARK LANDEROS  
11 taxed R.A. the amount of approximately one-third of R.A.'s drugs for  
12 the right to sell the remainder in LACJ.

13       Overt Act No. 240: On April 24, 2014, defendant MARK LANDEROS  
14 taxed R.C. the amount of approximately one-third of R.C.'s drugs for  
15 the right to sell the remainder in LACJ.

16       Overt Act No. 241: On April 24, 2014, defendant MARK LANDEROS  
17 taxed defendant MIGUEL GARCIA the amount of approximately one-third  
18 of defendant MIGUEL GARCIA's drugs for the right to sell the  
19 remainder in LACJ.

20       Overt Act No. 242: On April 26, 2014, defendant MARK LANDEROS  
21 taxed P.M. the amount of approximately one-third of P.M.'s drugs for  
22 the right to sell the remainder in LACJ.

23       Overt Act No. 243: On April 28, 2014, defendant MARK LANDEROS  
24 possessed a ledger detailing his collection of the thirds tax.

25       Attempted Murder of J.B.-2 and Kidnapping and Assault and Attempted  
26 Murder of C.R.

27       Overt Act No. 244: On December 16, 2013, an unidentified co-  
28 conspirator repeatedly stabbed J.B.-2 in the head on defendant JOSE

1 LANDA-RODRIGUEZ's orders, in retaliation for defendant ALVARO RUIZ  
2 defying defendant JOSE LANDA-RODRIGUEZ.

3 Overt Act No. 245: On or before April 21, 2014, defendant JOSE  
4 LANDA-RODRIGUEZ sanctioned a kidnapping of C.R. in retaliation for  
5 defendant ALVARO RUIZ defying defendant JOSE LANDA-RODRIGUEZ.

6 Overt Act No. 246: On April 21, 2014, defendant DAVID DIAZ sent  
7 a coded text message to defendant DIANA MARTINEZ stating that C.R.  
8 needed to be assaulted on Mexican Mafia LACJ Enterprise orders.

9 Overt Act No. 247: On April 22, 2014, defendants DIANA MARTINEZ  
10 and DAVID DIAZ picked up C.R. from C.R.'s residence in the City of  
11 Pomona and drove C.R. to defendant DAVID VILLALOBOS' residence in San  
12 Bernardino County so that defendant DAVID VILLALOBOS could detain and  
13 assault C.R.

14 Overt Act No. 248: On April 22, 2014, defendant DAVID  
15 VILLALOBOS obtained duct tape and attempted to restrain C.R. in the  
16 garage of his residence in San Bernardino County so that he could  
17 kill C.R.

18 Overt Act No. 249: On April 22, 2014, defendant DAVID  
19 VILLALOBOS assaulted C.R. with the intent to kill C.R.

20 Smuggling of Heroin and Methamphetamine into LACJ

21 Overt Act No. 250: From April 18, 2014, through April 20, 2014,  
22 defendants GABRIEL ZENDEJAS-CHAVEZ, DONATO GONZALES, and ALVARO RUIZ,  
23 and unindicted co-conspirator Frank Herrera, arranged for heroin and  
24 methamphetamine to be smuggled into MCJ.

25 Overt Act No. 251: On April 22, 2014, unindicted co-  
26 conspirator Martin Salazar possessed and hid approximately 2.37 grams  
27 of heroin and 7.75 grams of methamphetamine that had been smuggled

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1 into LACJ by unindicted co-conspirator Ramon Amaya on behalf of the  
2 Mexican Mafia LACJ Enterprise.

3 Overt Act No. 252: Between April 25, 2014, and May 9, 2014,  
4 defendant DONATO GONZALES wrote a kite to defendant LUIS GARCIA that  
5 the "legal team" had sent drugs to defendant DONATO GONZALES and  
6 asked defendant LUIS GARCIA to look out for those drugs.

7 Overt Act No. 253: On June 2, 2014, defendant DONATO GONZALES  
8 wrote a coded letter, disguised as legal mail, to defendant GABRIEL  
9 ZENDEJAS-CHAVEZ stating that he had not received the heroin and  
10 methamphetamine.

11 Defendant GABRIEL ZENDEJAS-CHAVEZ Uses His Status as an Attorney to  
12 Pass Mexican Mafia Orders Regarding Assaults, Murder, and Drug  
13 Trafficking

14 Overt Act No. 254: On April 22, 2014, defendant GABRIEL  
15 ZENDEJAS-CHAVEZ used his status as an attorney to meet with defendant  
16 LUIS GARCIA and pass an order that "Dreamer" from the 18th Street  
17 gang, "Demon" from 18th Street gang, and "Blanco" from the VNE gang  
18 be assaulted or killed, pass messages from Mexican Mafia members at  
19 the ADX Florence federal prison, discuss other Mexican Mafia business  
20 including obtaining drugs from Mexican drug cartels, and report that  
21 he would be travelling to Mexico to work on an alliance with a drug  
22 cartel.

23 Overt Act No. 255: Between May 5, 2014, and May 11, 2014,  
24 defendant GABRIEL ZENDEJAS-CHAVEZ travelled to Mexico.

25 Defendant GABRIEL ZENDEJAS-CHAVEZ Used his Status to Pass Mexican  
26 Mafia Messages to JOSE LANDA-RODRIGUEZ

27 Overt Act No. 256: On April 22, 2014, defendant GABRIEL  
28 ZENDEJAS-CHAVEZ used his status as an attorney to meet with defendant

1 JOSE LANDA-RODRIGUEZ and pass a message from Mexican Mafia member 11  
2 that Federal Mexican Mafia members would not be recognizing three  
3 State Mexican Mafia members as brothers.

4 Overt Act No. 257: On April 22, 2014, during his meeting with  
5 defendant JOSE LANDA-RODRIGUEZ, defendant GABRIEL ZENDEJAS-CHAVEZ  
6 passed a message from DMM-2 about removing A.E. from Mexican Mafia  
7 membership.

8 Overt Act No. 258: Between April 22, 2014, and April 25, 2014,  
9 defendant JOSE LANDA-RODRIGUEZ passed a message to defendant DONATO  
10 GONZALES to confirm that A.E. was being removed from Mexican Mafia  
11 membership.

12 Overt Act No. 259: From April 25, 2014, through May 9, 2014,  
13 defendant JOSE LANDA-RODRIGUEZ directed defendant LUIS GARCIA to have  
14 defendant GABRIEL ZENDEJAS-CHAVEZ use his status as an attorney to  
15 obtain documentation that a Mexican Mafia associate was cooperating  
16 with law enforcement to justify the murder of that Mexican Mafia  
17 associate.

18 Possession of Methamphetamine

19 Overt Act No. 260: On April 30, 2014, defendant DIANA MARTINEZ  
20 drove defendant GERARDO TAPIA to pick up approximately four pounds,  
21 or 1,746 grams, of methamphetamine for further distribution.

22 Overt Act No. 261: On April 30, 2014, defendant GERARDO TAPIA  
23 possessed approximately four pounds, or 1,746 grams, of  
24 methamphetamine for further distribution.

25 Defendant GABRIEL ZENDEJAS-CHAVEZ Uses His Status as an Attorney to  
26 Discuss Mexican Mafia Business

27 Overt Act No. 262: On April 28, 2014, and May 5, 2014,  
28 defendant GABRIEL ZENDEJAS-CHAVEZ used his status as an attorney to

1 meet separately with defendants LUIS GARCIA, DONATO GONZALES, and  
2 JOSE LANDA-RODRIGUEZ at LACJ.

3 Overt Act No. 263: On April 28, 2014, and May 5, 2014, in  
4 meetings at LACJ, defendant GABRIEL ZENDEJAS-CHAVEZ informed  
5 defendant LUIS GARCIA: that Federal Mexican Mafia members at the ADX  
6 Florence federal prison had not voted for Mexican Mafia membership  
7 for "Psycho"; that Mexican Mafia member 11 had placed "Wolf" in  
8 charge of the 18th Street gang; that Mexican Mafia member 9 had  
9 advised that Deceased Mexican Mafia members 3 and 4 were feuding, and  
10 to not get dragged into the feud; and to hold off on the assaults of  
11 "Dreamer" from the 18th Street gang, "Demon" from 18th Street gang,  
12 and "Blanco" from the VNE gang, that they had previously discussed.

13 Possession of Methamphetamine, Including Methamphetamine to be  
14 Smuggled into LACJ

15 Overt Act No. 264: On May 9, 2014, defendant GERARDO TAPIA  
16 possessed approximately 558.6 grams of methamphetamine in his  
17 residence with the intent to distribute the methamphetamine,  
18 including to smuggle some of it into LACJ.

19 Overt Act No. 265: On May 9, 2014, DMM-2 possessed, in  
20 defendant GERARDO TAPIA's residence, a letter concerning Mexican  
21 Mafia business written by DMM-2 and Green Dot numbers related to  
22 Mexican Mafia LACJ Enterprise activities.

23 JOSE LANDA-RODRIGUEZ Orders the Assault of Mark Landeros and the  
24 Distribution of Mexican Mafia Proceeds

25 Overt Act No. 266: Between April 25, 2014, and May 9, 2014,  
26 defendant JOSE LANDA-RODRIGUEZ ordered defendant LUIS GARCIA to  
27 assault and fine MARK LANDEROS for violating Mexican Mafia rules, to

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1 remove him as the shotcaller and to place another person as a  
2 shotcaller.

3 Overt Act No. 267: Between April 25, 2014, and May 9, 2014,  
4 defendant JOSE LANDA-RODRIGUEZ directed the payment of thousands of  
5 dollars of Mexican Mafia proceeds to other members.  
6 Defendant GABRIEL ZENDEJAS-CHAVEZ Informs Others that LUIS GARCIA had  
7 Dropped Out of the Mexican Mafia

8 Overt Act No. 268: On May 28, 2014, in a recorded telephone  
9 call, defendants GABRIEL ZENDEJAS-CHAVEZ and JOSE LANDA-RODRIGUEZ  
10 discussed the fact that defendant LUIS GARCIA had "dropped-out" of  
11 the Mexican Mafia and should not be included in Mexican Mafia  
12 business any longer.

13 Overt Act No. 269: From May 28, 2014, through at least May 30,  
14 2014, defendant GABRIEL ZENDEJAS-CHAVEZ informed other co-  
15 conspirators that defendant LUIS GARCIA had "dropped-out" of the  
16 Mexican Mafia.

17 Overt Act No. 270: Between May 18, 2014, and July 16, 2014,  
18 defendant GABRIEL ZENDEJAS-CHAVEZ wrote, in correspondence disguised  
19 as legal mail, to Mexican Mafia member 12 at Pelican Bay State Prison  
20 that defendant LUIS GARCIA had "dropped-out" of the Mexican Mafia.  
21 HECTOR DUARTE and NANCY DUARTE Carry out Mexican Mafia LACJ  
22 Enterprise Business at NCCF on behalf of DMM-2

23 Overt Act No. 271: From at least July 6, 2014, through November  
24 10, 2014, DMM-2 directed defendant HECTOR DUARTE to run NCCF on  
25 behalf of the Mexican Mafia LACJ Enterprise; defendant HECTOR DUARTE  
26 collected kitty money, assigned fines as discipline, ordered assaults  
27 to maintain discipline, and passed messages to defendant NANCY DUARTE  
28 to be passed to DMM-2's secretary, defendant MIGUEL RODRIGUEZ.

1        Overt Act No. 272: From at least July 6, 2014, through October  
2 23, 2014, defendant NANCY DUARTE assisted defendant HECTOR DUARTE in  
3 running the Mexican Mafia LACJ Enterprise's activities in NCCF on  
4 behalf of DMM-2, including by passing messages between defendant  
5 HECTOR DUARTE and defendant MIGUEL RODRIGUEZ, who was DMM-2's  
6 secretary.

7        Overt Act No. 273: On July 6, 2014, in a recorded telephone  
8 conversation, defendant HECTOR DUARTE told defendant NANCY DUARTE  
9 that, based on information from defendant CHRIS FERREIRA, an unknown  
10 Hispanic gang member was to be assaulted and extorted for \$1,000 for  
11 dealing with African-American inmates.

12        Overt Act No. 274: On July 25, 2014, in a recorded telephone  
13 conversation, defendant CHRIS FERREIRA relayed Green-Dot card numbers  
14 to defendant NANCY DUARTE representing \$425 in Mexican Mafia LACJ  
15 Enterprise extortion money.

16        Overt Act No. 275: On August 4, 2014, defendant NANCY DUARTE  
17 directed an unknown floor shot-caller within NCCF to send  
18 "everything," that is, the drug and extortion money, to defendant  
19 HECTOR DUARTE because defendant HECTOR DUARTE was in charge of NCCF  
20 for DMM-2.

21        Overt Act No. 276: On August 6, 2014, defendant HECTOR DUARTE  
22 gave defendant NANCY DUARTE a Green Dot number representing kitty  
23 proceeds.

24        Overt Act No. 277: On August 15, 2014, in a recorded telephone  
25 conversation, defendants MIGUEL RODRIGUEZ, HECTOR DUARTE, and NANCY  
26 DUARTE discussed Mexican Mafia LACJ Enterprise matters including  
27 defendant NANCY DUARTE giving defendant MIGUEL RODRIGUEZ Green Dot  
28 numbers representing proceeds from Mexican Mafia LACJ Enterprise



1 activities, and discipline to be imposed on an unknown Hispanic gang  
2 member because the unknown Hispanic gang member had "dropped-out" and  
3 gone into protective custody.

4 Overt Act No. 278: On August 15, 2014, in a recorded telephone  
5 conversation, defendant HECTOR DUARTE asked defendant MIGUEL  
6 RODRIGUEZ how much discipline to impose on an unknown Hispanic gang  
7 member, and defendant MIGUEL RODRIGUEZ conferred with DMM-2 then told  
8 defendant HECTOR DUARTE how to administer discipline and to decide on  
9 an amount for a fine.

10 Overt Act No. 279: On August 15, 2014, in a recorded telephone  
11 conversation, defendant HECTOR DUARTE stated that he would impose a  
12 \$10,000 fine and order that an unknown Hispanic gang member be beaten  
13 three times for 39 seconds.

14 Overt Act No. 280: On August 15, 2014, in a recorded telephone  
15 conversation, defendant MIGUEL RODRIGUEZ directed defendant HECTOR  
16 DUARTE to control the Mexican Mafia LACJ Enterprise's activities in  
17 the south and north facilities of NCCF.

18 Overt Act No. 281: On August 15, 2014, in a recorded telephone  
19 conversation, defendant NANCY DUARTE relayed messages between  
20 defendant HECTOR DUARTE and defendant MIGUEL RODRIGUEZ and DMM-2  
21 about discipline of an unknown Hispanic gang member and other Mexican  
22 Mafia LACJ Enterprise business.

23 Overt Act No. 282: On August 20, 2014, in a recorded telephone  
24 conversation, defendants HECTOR DUARTE, NANCY DUARTE, and MIGUEL  
25 RODRIGUEZ discussed Mexican Mafia LACJ Enterprise matters; defendant  
26 HECTOR DUARTE gave defendant NANCY DUARTE Green Dot numbers  
27 representing kitty proceeds; defendant MIGUEL RODRIGUEZ told  
28 defendant HECTOR DUARTE that DMM-2 was upset about not receiving

1 \$10,000 in fine money and that the north facility of NCCF was a month  
2 behind in making their payments; and defendant MIGUEL RODRIGUEZ  
3 informed defendant HECTOR DUARTE that DMM-2 wanted the shot-caller  
4 for the north facility to be changed.

5 Overt Act No. 283: On August 31, 2014, in a recorded telephone  
6 call, defendant HECTOR DUARTE relayed Green Dot card numbers to  
7 defendant NANCY DUARTE representing \$385 in Mexican Mafia LACJ  
8 Enterprise extortion money.

9 Overt Act No. 284: On August 31, 2014, in a recorded telephone  
10 call, defendant HECTOR DUARTE directed defendant NANCY DUARTE that a  
11 Sureno was to be assaulted for losing Mexican Mafia LACJ Enterprise  
12 extortion money.

13 Overt Act No. 285: On October 23, 2014, defendant NANCY DUARTE  
14 possessed ledgers containing her records of Mexican Mafia LACJ  
15 Enterprise kitty, drug, and fine debts and payments.

16 Directions to Send Mexican Mafia LACJ Enterprise Business and  
17 Proceeds Through Defendant GABRIEL ZENDEJAS-CHAVEZ

18 Overt Act No. 286: On August 30, 2014, unindicted co-  
19 conspirator 43 ("UICC-43") possessed a kite written by another  
20 unknown co-conspirator directing that Mexican Mafia LACJ Enterprise  
21 proceeds from drug sales in LACJ and kitty money from LACJ should be  
22 sent to defendant GABRIEL ZENDEJAS-CHAVEZ and directing that  
23 defendant ERNESTO VARGAS be recognized as having the authority to run  
24 NCCF.

25 Assault and Extortion of M.C. for Interfering with Mexican Mafia LACJ  
26 Enterprise Extortion

27 Overt Act No. 287: From August 20, 2014, and September 26,  
28 2014, defendants GAIL PONCE, DAVID BERNARDINO, HECTOR DUARTE, and

1 NANCY DUARTE processed the proceeds of the Mexican Mafia LACJ  
2 Enterprises extortion and drug trafficking activities using Green Dot  
3 accounts.

4 Overt Act No. 288: On September 1, 2014, in a recorded  
5 telephone call, defendant DAVID BERNARDINO reported to defendant GAIL  
6 PONCE that a Paisa was taxing inmates and asked defendant GAIL PONCE  
7 to get instructions from defendants HECTOR DUARTE and NANCY DUARTE as  
8 to how to deal with the Paisa.

9 Overt Act No. 289: On September 1 or 2, 2014, defendant GAIL  
10 PONCE told defendant NANCY DUARTE that defendant DAVID BERNARDINO  
11 wanted instructions on how to deal with the Paisa who was taxing  
12 inmates.

13 Overt Act No. 290: On September 2, 2014, in a recorded  
14 telephone call, defendant NANCY DUARTE told defendant HECTOR DUARTE  
15 about the Paisa who was taxing inmates and asked if defendant HECTOR  
16 DUARTE wanted the Paisa to be assaulted.

17 Overt Act No. 291: On September 2, 2014, in a recorded  
18 telephone call, defendant HECTOR DUARTE told defendant NANCY DUARTE  
19 that defendant DAVID BERNARDINO should investigate which Mexican  
20 Mafia member the Paisa claims to work for and to assault the Paisa  
21 for 39 seconds.

22 Overt Act No. 292: On September 2 or 3, 2014, defendant NANCY  
23 DUARTE passed along to defendant GAIL PONCE defendant HECTOR DUARTE's  
24 message that defendant DAVID BERNARDINO should investigate which  
25 Mexican Mafia member the Paisa claims to work for and to assault the  
26 Paisa for 39 seconds.

27 Overt Act No. 293: On September 3, 2014, in a recorded  
28 telephone call, defendant GAIL PONCE passed along to defendant DAVID

1 BERNARDINO defendant HECTOR DUARTE's message that defendant DAVID  
2 BERNARDINO should investigate which Mexican Mafia member the Paisa  
3 claimed to work for and to assault the Paisa for 39 seconds.

4 Overt Act No. 294: On September 3 or 4, 2014, defendant DAVID  
5 BERNARDINO ordered that the Paisa, now known to be M.C., be  
6 assaulted.

7 Overt Act No. 295: On September 4, 2014, unindicted co-  
8 conspirators assaulted M.C. as discipline for disrespecting Mexican  
9 Mafia LACJ Enterprise's authority.

10 Overt Act No. 296: On September 5, 2014, in a recorded  
11 telephone call, defendant DAVID BERNARDINO reported to defendant GAIL  
12 PONCE that the Paisa, Marco Calderon, had been assaulted, but that  
13 the assault was not completed because Marco Calderon screamed and  
14 deputies interceded before the assault "could really get going."

15 Assault of E.O to Collect an Extortion Debt

16 Overt Act No. 297: On September 7, 2014, in a recorded  
17 telephone call, defendant MIGUEL RODRIGUEZ directed HECTOR DUARTE to  
18 have E.O. assaulted for failing to pay the Mexican Mafia LACJ  
19 Enterprise's thirds tax and for lying about doing so under the  
20 authority of another Mexican Mafia member.

21 Overt Act No. 298: On September 8, 2014, defendant HECTOR  
22 DUARTE ordered that E.O. be assaulted and his drugs were to be  
23 confiscated because E.O. had lied about another Mexican Mafia member  
24 "blessing" the drugs.

25 Overt Act No. 299: On September 9, 2014, unindicted co-  
26 conspirators assaulted E.O. as discipline for violating Mexican  
27 Mafia LACJ Enterprise rules.

28 ///

1        Overt Act No. 300: On September 11, 2014, unindicted co-  
2 conspirators assaulted E.O. as discipline for violating Mexican Mafia  
3 LACJ Enterprise rules.

4        Conspiracy to Remove Mexican Mafia Member A.E. From Power and to Take  
5 Over His Territories

6        Overt Act No. 301: On or before April 25, 2014, defendant JOSE  
7 LANDA-RODRIGUEZ wrote a kite to defendant DONATO GONZALES to inform  
8 him that defendants JOSE LANDA-RODRIGUEZ, DMM-2, and other Mexican  
9 Mafia members intended to strip Mexican Mafia membership from A.E.

10       Overt Act No. 302: On or before April 25, 2014, defendant JOSE  
11 LANDA-RODRIGUEZ wrote a kite to defendant LUIS GARCIA to inform him  
12 that defendant JOSE LANDA-RODRIGUEZ, DMM-2, and other Mexican Mafia  
13 members intended to strip Mexican Mafia membership from A.E.

14       Overt Act No. 303: On or before April 25, 2014, defendant  
15 GABRIEL ZENDEJAS-CHAVEZ passed a message from DMM-2 to defendant JOSE  
16 LANDA-RODRIGUEZ regarding the decision to strip Mexican Mafia  
17 membership from A.E.

18       Overt Act No. 304: On June 30, 2014, in a recorded telephone  
19 conversation, defendant JOSE LANDA-RODRIGUEZ and unindicted co-  
20 conspirator 45 ("UICC-44") discussed threatening the life of D.C.  
21 because of his alignment with Mexican Mafia member A.E. and his  
22 collecting of taxes in areas controlled by defendant JOSE LANDA-  
23 RODRIGUEZ.

24       Overt Act No. 305: In or around August 2014, defendants GABRIEL  
25 ZENDEJAS-CHAVEZ, RAFAEL LEMUS, ERNESTO VARGAS, and MIGUEL RODRIGUEZ  
26 met at defendant GABRIEL ZENDEJAS-CHAVEZ' law office and discussed  
27 A.E. being removed from the Mexican Mafia and other members taking  
28 over his territories.

1        Overt Act No. 306: On September 14, 2014, an unknown co-  
2 conspirator killed D.C. because of his alignment with A.E. and his  
3 collection of taxes in areas controlled by defendant JOSE LANDA-  
4 RODRIGUEZ.

5        Overt Act No. 307: On October 22, 2014, defendant MIGUEL  
6 RODRIGUEZ passed a message to defendant JOSE LANDA-RODRIGUEZ from  
7 defendant RAFAEL LEMUS that Mexican Mafia members were in agreement  
8 about stripping A.E. of his membership and taking over his  
9 territories.

10       Overt Act No. 308: On November 11, 2014, an unknown co-  
11 conspirator killed D.E. because of his alignment with A.E.  
12 Defendant GABRIEL ZENDEJAS-CHAVEZ Used His Status as an Attorney to  
13 Pass Messages About Mexican Mafia Business

14       Overt Act No. 309: On September 2, 2014, September 3, 2014, and  
15 October 1, 2014, defendant GABRIEL ZENDEJAS-CHAVEZ used his status as  
16 an attorney to visit ten Mexican Mafia members at Pelican Bay State  
17 Prison, including Mexican Mafia member 4, and pass messages about new  
18 Mexican Mafia members and about the identity of possible cooperators.

19       Overt Act No. 310: Between October 1, 2014, and October 22,  
20 2014, after visiting Pelican Bay State Prison, defendant GABRIEL  
21 ZENDEJAS-CHAVEZ reported to defendants RAFAEL LEMUS and MIGUEL  
22 RODRIGUEZ that: defendant GABRIEL ZENDEJAS-CHAVEZ had found paperwork  
23 that defendant LUIS GARCIA, unindicted co-conspirator 45 ("UICC-45"),  
24 and UICC-38 were cooperating with law enforcement; Mexican Mafia  
25 Member 4 confirmed that "Cartoon" from the Canta Ranas gang was now a  
26 Mexican Mafia member; and A.E. had been stripped of his territories.

27       Overt Act No. 311: On or before October 22, 2014, defendant  
28 MIGUEL RODRIGUEZ wrote a kite at the direction of DMM-2's secretary,

1 defendant RAFAEL LEMUS, stating that defendant GABRIEL ZENDEJAS-  
2 CHAVEZ had found paperwork that defendant LUIS GARCIA, UICC-38, and  
3 UICC-45 were cooperating with law enforcement, that "Cartoon" from  
4 the Canta Ranas gang was now an Eme member, that A.E. had been  
5 stripped of his territories, and that the accompanying drugs belonged  
6 to DMM-2 and Mexican Mafia member 13.

7 Smuggling of Heroin and Mexican Mafia LACJ Enterprise Correspondence  
8 into LACJ

9 Overt Act No. 312: On or before October 21, 2014, defendant  
10 MIGUEL RODRIGUEZ directed unindicted co-conspirator Marco Meza to  
11 smuggle drugs and a kite into LACJ on behalf of DMM-2.

12 Overt Act No. 313: On October 22, 2014, at the direction of  
13 defendant MIGUEL RODRIGUEZ, unindicted co-conspirator Marco Meza  
14 smuggled approximately 18.82 grams of heroin into LACJ on behalf of  
15 the Mexican Mafia.

16 Overt Act No. 314: On October 22, 2014, unindicted co-  
17 conspirator Marco Meza possessed a kite from defendant MIGUEL  
18 RODRIGUEZ to defendant JOSE LANDA-RODRIGUEZ discussing Mexican Mafia  
19 LACJ Enterprise business, including the identity of potential  
20 cooperators as determined by defendant GABRIEL ZENDEJAS-CHAVEZ, the  
21 identity of a new Mexican Mafia member, and the standing of other  
22 Mexican Mafia members.

23 Possession of Heroin to be Smuggled into LACJ

24 Overt Act No. 315: On October 23, 2014, defendant MIGUEL  
25 RODRIGUEZ possessed approximately 25.78 grams of heroin at his  
26 residence with the intent to distribute it to other persons,  
27 including by smuggling into LACJ.

28 ///



Possession of Methamphetamine, Heroin, and Cocaine, Including to be  
Smuggled into LACJ and Possession of a Firearm

Overt Act No. 316: On October 24, 2014, defendant ERNESTO VARGAS possessed approximately 601.2 grams of methamphetamine, approximately 501.3 grams of heroin, approximately 83.4 grams of cocaine, and approximately 1.4 grams of cocaine base in the form of crack cocaine with the intent to distribute to others, including by smuggling into LACJ, for the benefit of the Mexican Mafia LACJ Enterprise.

Overt Act No. 317: On October 24, 2014, defendant ERNESTO VARGAS possessed a firearm, namely, a Kimber model Custom 2 .45 caliber pistol, and ammunition, in order to protect narcotics for the benefit of the Mexican Mafia LACJ Enterprise.

Attorney GABRIEL ZENDEJAS-CHAVEZ Passes Mexican Mafia Messages

Overt Act No. 318: On October 30, 2014, defendant GABRIEL ZENDEJAS-CHAVEZ visited Mexican Mafia member 11 at the ADX Florence federal prison in Colorado and showed secret messages to Mexican Mafia member 11.

Assaults of R.B. and M.G.

Overt Act No. 319: On August 22, 2015, in a recorded telephone conversation, defendant GENESSIS BLANCO told unindicted co-conspirator 48 ("UICC-48") to tell defendant ANDREW PINEDA to have R.B. assaulted because he was not recognizing the authority of DMM-2 and was interfering with Mexican Mafia LACJ Enterprise activities, including drug trafficking and extortion.

Overt Act No. 320: On August 22, 2015, in a recorded telephone conversation, defendant ANDREW PINEDA told defendant GENESSIS BLANCO that M.G. was causing problems by not respecting the authority of

1 DMM-2 and interfering with Mexican Mafia LACJ Enterprise activities,  
2 including drug trafficking and extortion.

3 Overt Act No. 321: On August 22, 2015, in a recorded telephone  
4 conversation, defendant GENESSIS BLANCO told defendant ANDREW PINEDA  
5 to have M.G. assaulted because he was not recognizing the authority  
6 of DMM-2 and was interfering with Mexican Mafia LACJ Enterprise  
7 activities, including drug trafficking and extortion.

8 Overt Act No. 322: On August 22, 2015, defendant ANDREW PINEDA  
9 ordered that R.B. and M.G. be assaulted for not recognizing the  
10 authority of DMM-2 and interfering with Mexican Mafia LACJ Enterprise  
11 activities, including drug trafficking and extortion.

12 Overt Act No. 323: On August 23, 2015, unindicted co-  
13 conspirators assaulted R.B. and M.G..

14 Overt Act No. 324: On and before October 23, 2015, defendant  
15 GENESSIS BLANCO possessed records of the Mexican Mafia LACJ  
16 Enterprises activities, including records of extortion and drug  
17 trafficking.

18 Murder of P.C.

19 Overt Act No. 325: On April 5, 2015, in a recorded telephone  
20 conversation, defendant ALVINO MUNOZ discussed a dispute over  
21 neighborhood taxation and fines of Echo Park gang members with P.C.,  
22 and P.C. told defendant ALVINO MUNOZ that he takes orders from  
23 another Mexican Mafia member and would not talk to defendant ALVINO  
24 MUNOZ about it, and would only talk to defendant JOSE LANDA-  
25 RODRIGUEZ.

26 Overt Act No. 326: On April 5, 2015, in a recorded telephone  
27 conversation, defendant ALVINO MUNOZ discussed with unindicted co-  
28 conspirator 50 ("UICC-50") the dispute with P.C.

1        Overt Act No. 327: On April 27, 2015, defendant SAMANTHA RIVERA  
2 initiated a three-way call from defendant JOSE LANDA-RODRIGUEZ to  
3 Mexican Mafia member 14 and DMM-2, and in a recorded telephone  
4 conversation, defendant JOSE LANDA-RODRIGUEZ discussed with Mexican  
5 Mafia member 14 that defendant ALVINO MUNOZ had sent someone to  
6 collect the fines of Echo Park gang members, but P.C. was interfering  
7 with the collection of the fine and was disrespectful to defendant  
8 ALVINO MUNOZ.

9        Overt Act No. 328: On April 27, 2015, in the three-way call  
10 initiated by defendant SAMANTHA RIVERA, defendant JOSE LANDA-  
11 RODRIGUEZ discussed with DMM-2 that P.C. was interfering in his  
12 business and tried to push a "hard line" with defendant ALVINO MUNOZ.

13        Overt Act No. 329: On July 19, 2015, in a recorded telephone  
14 conversation, defendant ALVINO MUNOZ and UICC-50 discussed that P.C.  
15 had blocked the payment of a fine, UICC-50 stated that P.C. worked  
16 for another Mexican Mafia member, and defendant ALVINO MUNOZ told  
17 UICC-50 to shut down P.C.'s activities.

18        Overt Act No. 330: On July 19, 2015, in a recorded telephone  
19 conversation, defendant JOSE LANDA-RODRIGUEZ told defendant SAMANTHA  
20 RIVERA that P.C. is interfering and that defendant SAMANTHA RIVERA  
21 and Mexican Mafia member 4 should talk to him.

22        Overt Act No. 331: On July 19, 2015, in coded language during a  
23 recorded telephone conversations, UICC-9, on defendant JOSE LANDA-  
24 RODRIGUEZ' orders, told unindicted co-conspirator 51 ("UICC-51") the  
25 following: that P.C. was defying defendant JOSE LANDA-RODRIGUEZ; that  
26 defendant JOSE LANDA-RODRIGUEZ was angry; to meet with P.C. and  
27 "teach him a little lesson"; to tell P.C. to stay on his side of "the  
28 bridge"; that P.C. was on the "Green Light" list; that defendant JOSE

1 LANDA-RODRIGUEZ wants P.C. "cut loose"; that defendant JOSE LANDA-  
2 RODRIGUEZ' decision is "final"; that there will be punishment for  
3 disregarding what defendant JOSE LANDA-RODRIGUEZ said; that UICC-51  
4 should contact DMM-2 to confirm the order; and that defendant JOSE  
5 LANDA-RODRIGUEZ was very angry, "pacing back and forth" and wanted to  
6 teach P.C. a lesson.

7 Overt Act No. 332: On July 26, 2015, in a recorded telephone  
8 conversation, UICC-9 told UICC-51 that defendant JOSE LANDA-RODRIGUEZ  
9 put P.C. on the Green Light list and told UICC-51 to have an  
10 unidentified co-conspirator lure P.C. in.

11 Overt Act No. 333: On November 21, 2015, unknown co-  
12 conspirators shot and killed P.C.

13 Defendant RAFAEL LEMUS Assists Robert Ruiz in Running Mexican Mafia  
14 LACJ Enterprise Business, Including Drug Trafficking and Extortion

15 Overt Act No. 334: Beginning in or prior to February 2014, and  
16 continuing until at least May 2015, defendant RAFAEL LEMUS assisted  
17 DMM-2 in running Mexican Mafia LACJ Enterprise business. Defendant  
18 RAFAEL LEMUS assisted in obtaining drugs from Mexico and passed  
19 messages from DMM-2 to others including to and from defendant GABRIEL  
20 ZENDEJAS-CHAVEZ.

21 Overt Act No. 335: On February 11, 2015, in a recorded  
22 telephone conversation, defendant RAFAEL LEMUS told an associate of  
23 A.E. that the areas formerly controlled by A.E. now belonged to  
24 defendant JOSE LANDA-RODRIGUEZ, DMM-2, and their associates.

25 Overt Act No. 336: On May 8, 2015, defendant RAFAEL LEMUS  
26 possessed approximately \$11,500 and Mexican Mafia-related  
27 correspondence at his residence.

28 ///

1       Overt Act No. 337: On November 20, 2015, in a recorded  
2 telephone conversation, defendant HECTOR DUARTE explained to UICC-5  
3 the money he collected as a shotcaller in NCCF.

4       Overt Act No. 338: On November 20, 2015, UICC-5 connected  
5 defendant RAFAEL LEMUS into a three-way call with defendant HECTOR  
6 DUARTE.

7       Overt Act No. 339: On November 20, 2015, in a recorded  
8 telephone conversation, defendant RAFAEL LEMUS told defendant HECTOR  
9 DUARTE that he would investigate HECTOR DUARTE's "numbers," that is,  
10 the amount of Mexican Mafia LACJ Enterprise drug trafficking and  
11 extortion proceeds he forwarded, and asked HECTOR DUARTE if anyone  
12 could verify his numbers.

13       Overt Act No. 340: On November 20, 2015, in a recorded  
14 telephone conversation, defendant RAFAEL LEMUS told defendant HECTOR  
15 DUARTE that UICC-5 is the "Senora" for DMM-2, that people should  
16 listen to UICC-5, and that failure to recognize UICC-5 will result in  
17 an assault.

18       Overt Act No. 341: On November 22, 2015, in a recorded  
19 telephone conversation, defendant RAFAEL LEMUS told defendant ANDREW  
20 PINEDA and UICC-5 that defendant MIGUEL RODRIGUEZ has no status with  
21 the Mexican Mafia LACJ Enterprise and that anyone using defendant  
22 MIGUEL RODRIGUEZ' name will be assaulted.

23       Overt Act No. 342: On November 22, 2015, in a recorded  
24 telephone conversation, defendant RAFAEL LEMUS stated that he has the  
25 authority to appoint secretaries, that he appointed UICC-5, and that  
26 anyone who gives UICC-5 trouble will "hear from him" and have  
27 problems that follow them outside of LACJ.

28       ///

1 Smuggling of Methamphetamine and Heroin into LACJ

2 Overt Act No. 343: From August 19, 2015, through September 1,  
3 2015, defendants ALVINO MUNOZ and KELLY JO BELL, and unindicted co-  
4 conspirator Robert Ramirez, arranged to smuggle drugs into LACJ for  
5 the benefit of defendant JOSE LANDA-RODRIGUEZ.

6 Overt Act No. 344: On August 19, 2015, in a recorded telephone  
7 conversation, defendants ALVINO MUNOZ and KELLY JO BELL discussed  
8 smuggling drugs into LACJ.

9 Overt Act No. 345: On August 28, 2015, in a recorded telephone  
10 conversation, defendant KELLY JO BELL told defendant ALVINO MUNOZ  
11 that she was on her way to deliver drugs to the individual who would  
12 smuggle them into LACJ.

13 Overt Act No. 346: On August 28, 2015, defendant KELLY JO BELL  
14 delivered approximately 41.8 grams of methamphetamine to unindicted  
15 co-conspirator Alejandro Martinez to smuggle into LACJ for defendant  
16 JOSE LANDA-RODRIGUEZ.

17 Overt Act No. 347: On September 1, 2015, in a recorded  
18 telephone conversation, unindicted co-conspirator Robert Ramirez  
19 discussed with another unindicted co-conspirator the fact that  
20 unindicted co-conspirator Alejandro Martinez had the drugs to be  
21 smuggled into LACJ for defendant JOSE LANDA-RODRIGUEZ.

22 Overt Act No. 348: On August 30, 2015, unindicted co-  
23 conspirator Alejandro Martinez possessed approximately 41.8 grams of  
24 methamphetamine and 61.83 grams of heroin inside his body and got  
25 himself arrested in order to bring the methamphetamine and heroin  
26 into LACJ.

27 Overt Act No. 349: On September 1, 2015, in a recorded  
28 telephone conversation, defendant KELLY JO BELL learned that an

1 unindicted co-conspirator inside LACJ knew about unindicted co-  
2 conspirator Alejandro Martinez smuggling drugs into LACJ, had located  
3 unindicted co-conspirator Alejandro Martinez , and would keep  
4 defendant KELLY JO BELL updated as to the status of the drugs.

5 Overt Act No. 350: On October 14, 2015, defendant KELLY JO BELL  
6 possessed approximately 12.0 grams of methamphetamine and ledgers  
7 regarding Mexican Mafia LACJ Enterprise business.

8 Assault of C.G. for Interfering with Drug Trafficking and Extortion

9 Overt Act No. 351: On January 16, 2016, in a recorded telephone  
10 call, defendant MARK LANDEROS and UICC-6 discussed having C.G.  
11 assaulted in retaliation for C.G. attempting to take control of LACJ  
12 away from defendant JOSE LANDA-RODRIGUEZ.

13 Overt Act No. 352: On January 16, 2016, in a recorded telephone  
14 call, at defendant MARK LANDEROS' direction, UICC-6 called an  
15 unindicted co-conspirator and relayed defendant MARK LANDEROS' order  
16 that C.G. was to be assaulted.

17 Overt Act No. 353: On January 16, 2016, in a recorded telephone  
18 call, UICC-6 relayed an unindicted co-conspirator's message that C.G.  
19 was working under the orders of other Mexican Mafia members.

20 Overt Act No. 354: On January 16, 2016, UICC-6 relayed a  
21 message to UICC-16 that C.G. was to be assaulted under the authority  
22 of defendant JOSE LANDA-RODRIGUEZ for interfering with Mexican Mafia  
23 LACJ Enterprise operations, including drug trafficking and extortion.

24 Overt Act No. 355: On January 16, 2016, in a recorded telephone  
25 call, UICC-16 relayed the order that C.G. was to be assaulted to  
26 UICC-12, a shot-caller in LACJ.

27 ///

28 ///



1        Overt Act No. 356: On January 26, 2016, on the orders from  
2 defendant MARK LANDEROS and UICC-12, unindicted co-conspirators  
3 assaulted C.G. at the direction of the Mexican Mafia LACJ Enterprise.

4 G.    SPECIAL SENTENCING ALLEGATIONS

5        11. Beginning on a date unknown to the Grand Jury, and  
6 continuing to on or about the date of this Indictment, in Los Angeles  
7 County, within the Central District of California, and elsewhere,  
8 defendants JOSE LANDA-RODRIGUEZ, LUIS VEGA, GABRIEL ZENDEJAS-CHAVEZ,  
9 RAFAEL LEMUS, LUIS GARCIA, ALVINO MUNOZ, DANIEL CERVANTES, MIGUEL  
10 CALDERON, ERNESTO VARGAS, MIGUEL RODRIGUEZ, GILBERT PARRA, GERARDO  
11 TAPIA, DONATO GONZALES, MIGUEL GARCIA, HECTOR DUARTE, SAMANTHA  
12 RIVERA, MARK LANDEROS, JONATHAN VERDEJA, CECILIA VIRGEN, LAUREEN  
13 GARCIA, NANCY DUARTE, VALERIE TREJO, GENESSIS BLANCO, KELLY JO BELL,  
14 JOSE FLORES, MARK LEVY, VALENTIN CORDOVA, FRANKIE MEGORADO, JOSE  
15 OLEA, MANUEL JIMENEZ, ALAVARO LEYVA, CHRIS FERREIRA, DAVID  
16 BERNARDINO, ANDREW PINEDA, ALONDRA GOMEZ, MIRIAM MEZA, ANA MARTINEZ,  
17 ALVARO RUIZ, ADRIAN ARAIZA, GAIL PONCE, DIANA MARTINEZ, MARLON  
18 CORNEJO, ANGEL SANCHEZ, JUAN REYES, RICHARD BAILEY, MICHAEL BENNETT,  
19 and EDWIN AYALA, and others known and unknown to the Grand Jury,  
20 conspired and agreed with each other to knowingly and intentionally  
21 (i) distribute, and (ii) possess with intent to distribute:

22            a. at least 500 grams of a mixture and substance  
23 containing a detectable amount of methamphetamine, a Schedule II  
24 controlled substance, in violation of Title 21, United States Code,  
25 Sections 846 and (b)(1)(A)(viii);

26            b. at least 50 grams of methamphetamine, a Schedule II  
27 controlled substance, in violation of Title 21, United States Code,  
28 Sections 846 and (b)(1)(A)(viii);

1           c.     at least a kilogram of a mixture and substance  
2 containing a detectable amount of heroin, a Schedule I narcotic drug  
3 controlled substance, in violation of Title 21, United States Code,  
4 Sections 841(a)(1) and (b)(1)(A)(i).

5           12. On or about July 17, 2012, in Los Angeles County, within  
6 the Central District of California, defendant LUIS VEGA unlawfully  
7 willfully, deliberately, and with premeditation, attempted to  
8 intentionally kill an unknown Sureno with malice aforethought, in  
9 violation of California Penal Code Sections 31, 187, 189, and 664.

10          13. Beginning no later than on or about December 1, 2012, and  
11 continuing to on or about an unknown date, in Los Angeles County,  
12 within the Central District of California, defendant LUIS VEGA  
13 unlawfully, willfully, deliberately, and with premeditation,  
14 attempted to intentionally kill J.R. with malice aforethought, in  
15 violation of California Penal Code Sections 31, 187, 189, and 664.

16          14. On or about February 7, 2013, in Los Angeles County, within  
17 the Central District of California, defendant LUIS GARCIA unlawfully,  
18 willfully, deliberately, and with premeditation, attempted to  
19 intentionally kill M.A. with malice aforethought, in violation of  
20 California Penal Code Sections 31, 187, 189, and 664.

21          15. On or about December 16, 2013, in Los Angeles County,  
22 within the Central District of California, defendants JOSE LANDA-  
23 RODRIGUEZ and others unknown to the Grand Jury conspired unlawfully  
24 to kill J.B.-2 with malice aforethought, in violation of California  
25 Penal Code Sections 182 and 187.

26          16. From on or about April 5, 2015, through on or about  
27 November 21, 2015, in Los Angeles County, within the Central District  
28 of California, defendants JOSE LANDA-RODRIGUEZ and others unknown to

1 the Grand Jury conspired unlawfully to kill P.C. with malice  
2 aforethought, in violation of California Penal Code Sections 182 and  
3 187. On or about April 22, 2014, in Los Angeles and San Bernardino  
4 Counties, within the Central District of California, defendants DAVID  
5 VILLALOBOS and DAVID DIAZ unlawfully conspired to kill C.R. with  
6 malice aforethought, in violation of California Penal Code Sections  
7 182 and 187.

## COUNT TWO

[18 U.S.C. §§ 1959(a)(3), 2]

1. Paragraphs 1 through 13 of the General Allegations of this Indictment and paragraphs 2 through 6 of Count One are hereby re-alleged and incorporated by reference as though fully set forth herein.

2. At all times relevant to this Indictment, the Mexican Mafia LACJ Enterprise including its leaders, members, and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, although not a legal entity, which is engaged in, and the activities of which affected, interstate and foreign commerce. The Mexican Mafia LACJ Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. At all times relevant to this Indictment, the Mexican Mafia LACJ Enterprise, through its members and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), consisting of:

multiple acts involving:

a. Murder, in violation of California Penal Code Sections 21a, 31, 182, 187, 189, and 664;

b. Kidnapping, in violation of California Penal Code Sections 21a, 31, 182, 207, 209, and 664;

c. Robbery, in violation of California Penal Code Sections 21a, 31, 182, 211, 212, 212.5, 213, 215, and 664;

d. Extortion, in violation of California Penal Code Sections 21a, 31, 182, 518, 519, 524, and 664;

1 multiple offenses involving:

2 e. the distribution of, possession with intent to  
3 distribute, and conspiracy to possess with intent to distribute and  
4 distribute controlled substances, including methamphetamine, heroin,  
5 cocaine, cocaine base, and marijuana, in violation of Title 21,  
6 United States Code, Sections 841(a)(1) and 846;

7 and multiple acts indictable under the following provisions of  
8 federal law:

9 f. Title 18, United States Code, Section 1512, Tampering  
10 with a Witness;

11 g. Title 18, United States Code, Section 1513,  
12 Retaliating against a witness;

13 h. Title 18, United States Code, Sections 1956 and 1957,  
14 Money Laundering;

15 i. Title 18, United States Code, Section 1028, Identity  
16 Fraud; and

17 j. Title 18, United States Code, Section 1029, Access  
18 Device Fraud.

19 4. On or about March 31, 2013, in Los Angeles County, within  
20 the Central District of California, for the purpose of maintaining  
21 and increasing position in the Mexican Mafia LACJ Enterprise, an  
22 enterprise engaged in racketeering activity, defendants MARK  
23 LANDEROS, also known as ("aka") "Smokey," aka "Troy," aka "Hot," and  
24 JUAN LEONARD GARCIA, aka "Little John," aka "Trevor," unlawfully and  
25 knowingly assaulted A.R. with a dangerous weapon, which assault  
26 resulted in serious bodily injury, in violation of California Penal  
27 Code Sections 21a, 664, 245(a)(1), (4).

28

## COUNT THREE

[18 U.S.C. § 1959(a)(6)]

1. Paragraphs 1 through 13 of the General Allegations of this Indictment, paragraphs 2 through 6 of Count One, and Paragraphs 2 and 3 of Count Two of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

2. On or about April 23, 2013, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Mexican Mafia LACJ Enterprise, an enterprise engaged in racketeering activity, defendants MARK MARTINEZ, also known as ("aka") "Brat," AMO WEST, aka "Chico," RAMIRO ANDRADE, aka "Scrappy," OSWALDO QUINTERO, aka "Sporty," NICHOLAS ESCARCEGA, aka "Tweeks," CHRISTIAN FUENTES, aka "Nino," FRANCISCO RUIZ, aka "Pancho," aka "Scooby," and JOSE VERA, aka "Sapo," and others known and unknown to the Grand Jury, unlawfully and knowingly conspired to commit assault resulting in serious bodily injury against L.M. by means of force likely to produce great bodily injury, in violation of California Penal Code Sections 21a, 664, 245(a)(4).

COUNT FOUR

[18 U.S.C. §§ 1959(a)(1), 2(a)]

1. Paragraphs 1 through 13 of the General Allegations of this Indictment, paragraphs 2 through 6 of Count One, and Paragraphs 2 and 3 of Count Two of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

2. On or about April 22, 2014, in Los Angeles and San Bernardino Counties, within the Central District of California, for the purpose of maintaining and increasing position in the Mexican Mafia LACJ Enterprise, an enterprise engaged in racketeering activity, defendant DAVID VILLALOBOS, also known as "Grumpy," DAVID DIAZ, aka "Stomps," and DIANA MARTINEZ, aka "Devine," aiding and abetting each other, unlawfully and knowingly kidnapped C.R., in violation of California Penal Code Section 207.



COUNT FIVE

[18 U.S.C. § 1959(a)(5)]

1. Paragraphs 1 through 13 of the General Allegations of this Indictment, paragraphs 2 through 6 of Count One, and Paragraphs 2 and 3 of Count Two of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

2. On or about April 22, 2014, in Los Angeles and San Bernardino Counties, within the Central District of California, for the purpose of maintaining and increasing position in the Mexican Mafia LACJ Enterprise, an enterprise engaged in racketeering activity, defendants DAVID VILLALOBOS, also known as ("aka") "Grumpy," DAVID DIAZ, aka "Stomps," and DIANA MARTINEZ, aka "Devine," and others known and unknown to the Grand Jury, unlawfully and knowingly conspired to kidnap C.R., in violation of California Penal Code Sections 182 and 207.

## COUNT SIX

[21 U.S.C § 846]

1. Paragraphs 1 through 13 of the General Allegations of this Indictment, and paragraphs 1 through 6 of Count One of this Indictment, are re-alleged and incorporated by reference as though fully set forth herein.

A. OBJECTS OF THE CONSPIRACY

2. Beginning on a date unknown to the Grand Jury and continuing to on or about the date of this Indictment, in Los Angeles and San Bernardino Counties, within the Central District of California, and elsewhere, defendants JOSE LANDA-RODRIGUEZ, also known as ("aka") "Jose Rodriguez-Landa," aka "Jose Landa," aka "Jose Rodriguez," aka "Fox," aka "Fox Tapia," aka "F-X," aka "Alejandro Tapia," aka "Cola Rojo," aka "Red Tail," aka "Pops," aka "Tio," aka "The General," aka "Taras," aka "The Old Man," aka "The Animal," aka "Old School" ("JOSE LANDA-RODRIGUEZ"), LUIS VEGA, aka "Little One," aka "L-1," aka "Tito" ("LUIS VEGA"), GABRIEL ZENDEJAS-CHAVEZ, aka "Corbatas" ("GABRIEL ZENDEJAS-CHAVEZ"), RAFAEL LEMUS, aka "Ere," aka "The Voice," aka "La Voz" ("RAFAEL LEMUS"), LUIS GARCIA, aka "Hefty," aka "Grimm," aka "H" ("LUIS GARCIA"), ALVINO MUNOZ, aka "Bino," aka "B" ("ALVINO MUNOZ"), DANIEL CERVANTES, aka "Maniac," aka "J," aka "Paisa Jose" ("DANIEL CERVANTES"), MIGUEL CALDERON, aka "Big Speedy," aka "Mickey" ("MIGUEL CALDERON"), ERNESTO VARGAS, aka "Huero" aka "Huero Caballero," aka "Paisa Huero" ("ERNESTO VARGAS"), MIGUEL RODRIGUEZ, aka "Rebel," aka "Pee Wee," aka "R" ("MIGUEL RODRIGUEZ"), GILBERT PARRA, aka "Droopy," aka "Chavo" ("GILBERT PARRA"), GERARDO TAPIA, aka "Jerry" ("GERARDO TAPIA"), DONATO GONZALES, aka "Nato," aka "Nasty," aka "Debo," aka "Ray" ("DONATO GONZALES"), MIGUEL

1 GARCIA, aka "Toro," aka "Hulk," aka "T," aka "Horns" ("MIGUEL  
 2 GARCIA"), HECTOR DUARTE, aka "Lil Man," aka "Hecko" ("HECTOR  
 3 DUARTE"), SAMANTHA RIVERA, aka "Sam," aka "S" ("SAMANTHA RIVERA"),  
 4 MARK LANDEROS, aka "Smokey," aka "Troy," aka "Hot" ("MARK LANDEROS"),  
 5 JONATHAN VERDEJA, "Hardcore," aka "Duke" ("JONATHAN VERDEJA"),  
 6 CECILIA VIRGEN, aka "Cecilia DeLeon," aka "Sessy," aka "Hazel," aka  
 7 "Gia," aka "Sky," aka "Hooker" ("CECILIA VIRGEN"), LAUREEN GARCIA,  
 8 aka "L" ("LAUREEN GARCIA"), NANCY DUARTE, aka "Pink" ("NANCY  
 9 DUARTE"), VALERIE TREJO, aka "Val" ("VALERIE TREJO"), GENESSIS  
 10 BLANCO, aka "Pink" ("GENESSIS BLANCO"), KELLY JO BELL ("KELLY JO  
 11 BELL"), JOSE FLORES, aka "Silent," aka "Lo" ("JOSE FLORES"), MARK  
 12 LEVY, aka "Cloudy," aka "C3" ("MARK LEVY"), VALENTIN CORDOVA, aka  
 13 "Teen" ("VALENTIN CORDOVA"), FRANKIE MEGORADO, aka "Frankie  
 14 Mejorado," aka "Slick," aka "Junior," aka "Speedy" ("FRANKIE  
 15 MEGORADO"), JOSE OLEA, aka "Sniper" ("JOSE OLEA"), MANUEL JIMENEZ,  
 16 aka "Porky" ("MANUEL JIMENEZ"), ALAVARO LEYVA, aka "Flaco," aka  
 17 "Trigger" ("ALAVARO LEYVA"), CHRIS FERREIRA, aka "Caveman" ("CHRIS  
 18 FERREIRA"), DAVID BERNARDINO, aka "Downer" ("DAVID BERNARDINO"),  
 19 ANDREW PINEDA, aka "Mighty," aka "Shy Boy" ("ANDREW PINEDA"), ALONDRA  
 20 GOMEZ ("ALONDRA GOMEZ"), MIRIAM MEZA ("MIRIAM MEZA"), ANA MARTINEZ,  
 21 aka "Ana America," aka "Bandit" ("ANA MARTINEZ"), ALVARO RUIZ, aka  
 22 "Roach" ("ALVARO RUIZ"), ADRIAN ARAIZA, aka "Chemo" ("ADRIAN  
 23 ARAIZA"), GAIL PONCE, aka "Bashful" ("GAIL PONCE"), DIANA MARTINEZ,  
 24 aka "Devine" ("DIANA MARTINEZ"), MARLON CORNEJO, aka "Maniac"  
 25 ("MARLON CORNEJO"), ANGEL SANCHEZ, aka "Lil Triste" ("ANGEL  
 26 SANCHEZ"), JUAN REYES, aka "Cosmo" ("JUAN REYES"), RICHARD BAILEY,  
 27 aka "Spooks," aka "Nigger Richard," aka "Half and Half" ("RICHARD  
 28 BAILEY"), MICHAEL BENNETT, aka "Irish" ("MICHAEL BENNETT"), EDWIN

1 AYALA, aka "Happy" ("EDWIN AYALA"), ROBERT RAMIREZ, aka "Wiz"  
2 ("ROBERT RAMIREZ"), KRISTEN AYALA ("KRISTEN AYALA"), RICHARD GRIEGO,  
3 aka "Twisted," aka "Pretzel" ("RICHARD GRIEGO"), JONATHAN RODRIGUEZ,  
4 aka "Sharkie" ("JONATHAN RODRIGUEZ"), BRYANNA MCCULLAH, aka "Bee Bee"  
5 ("BRYANNA MCCULLAH"), JUAN NMN GARCIA, aka "Trouble" ("JUAN NMN  
6 GARCIA"), JONATHAN MENDEZ, aka "Casper," aka "Smokes" ("JONATHAN  
7 MENDEZ"), MARTIN SALZAR aka "Sweeper" ("MARTIN SALAZAR"), RAMON  
8 AMAYA, aka "Lil Happy" ("RAMON AMAYA"), FRANK HERRERA, aka "Dopey,"  
9 aka "Ben" ("FRANK HERRERA"), ALEJANDRO MARTINEZ, aka "Smokey"  
10 ("ALEJANDRO MARTINEZ"), and MARCO MEZA, aka "Green Eyes," aka "Ojos"  
11 ("MARCO MEZA"), and others known and unknown to the Grand Jury,  
12 conspired and agreed with each other to knowingly and intentionally  
13 distribute, and possess with intent to distribute, the following  
14 controlled substances:

15 a. at least 500 grams of a mixture and substance  
16 containing a detectable amount of methamphetamine, a Schedule II  
17 controlled substance, in violation of Title 21, United States Code,  
18 Sections 841(a)(1) and (b)(1)(A)(viii);

19 b. at least 50 grams of methamphetamine, a Schedule II  
20 controlled substance, in violation of Title 21, United States Code,  
21 Sections 841(a)(1) and (b)(1)(A)(viii);

22 c. at least 100 grams of a mixture and substance  
23 containing a detectable amount of heroin, a Schedule I narcotic drug  
24 controlled substance, in violation of Title 21, United States Code,  
25 Sections 841(a)(1) and (b)(1)(B)(i);

26 d. cocaine, a Schedule II narcotic drug controlled  
27 substance, in violation of Title 21, United States Code, Sections  
28 841(a)(1) and (b)(1)(C); and

1 e. marijuana, a Schedule I controlled substance, in  
 2 violation of Title 21, United States Code, Sections 841(a)(1) and  
 3 (b)(1)(D).

4 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE  
 5 ACCOMPLISHED

6 3. Paragraph 9 of Count One of this Indictment is re-alleged  
 7 and incorporated by reference as if fully set forth herein.

8 C. OVERT ACTS

9 4. On or about the following dates, in furtherance of the  
 10 conspiracy, and to accomplish the object of the conspiracy,  
 11 defendants JOSE LANDA-RODRIGUEZ, LUIS VEGA, GABRIEL ZENDEJAS-CHAVEZ,  
 12 RAFAEL LEMUS, LUIS GARCIA, ALVINO MUNOZ, DANIEL CERVANTES, MIGUEL  
 13 CALDERON, ERNESTO VARGAS, MIGUEL RODRIGUEZ, GILBERT PARRA, GERARDO  
 14 TAPIA, DONATO GONZALES, MIGUEL GARCIA, HECTOR DUARTE, SAMANTHA  
 15 RIVERA, MARK LANDEROS, JONATHAN VERDEJA, CECILIA VIRGEN, LAUREEN  
 16 GARCIA, NANCY DUARTE, VALERIE TREJO, GENESSIS BLANCO, KELLY JO BELL,  
 17 JOSE FLORES, MARK LEVY, VALENTIN CORDOVA, FRANKIE MEGORADO, JOSE  
 18 OLEA, MANUEL JIMENEZ, ALAVARO LEYVA, CHRIS FERREIRA, DAVID  
 19 BERNARDINO, ANDREW PINEDA, ALONDRA GOMEZ, MIRIAM MEZA, ANA MARTINEZ,  
 20 ALVARO RUIZ, ADRIAN ARAIZA, GAIL PONCE, DIANA MARTINEZ, MARLON  
 21 CORNEJO, ANGEL SANCHEZ, JUAN REYES, RICHARD BAILEY, MICHAEL BENNETT,  
 22 EDWIN AYALA, ROBERY RAMIREZ, KRISTEN AYALA, RICHARD GRIEGO, JONATHAN  
 23 RODRIGUEZ, BRYANNA MCCULLAH, JUAN NMN GARCIA, JONATHAN MENDEZ, MARTIN  
 24 SALAZAR, RAMON AMAYA, FRANK HERRERA, ALEJANDRO MARTINEZ, and MARCO  
 25 MEZA, and others known and unknown to the Grand Jury, committed and  
 26 caused to be committed various overt acts within the Central District  
 27 of California, and elsewhere, including, but not limited to, Overt  
 28 Acts numbered 1 through 356 as set forth in Section F of Count One of

1 this Indictment, which are re-alleged and incorporated by reference  
2 as if fully set forth herein, in addition to the following:

3 Smuggling of Heroin and Methamphetamine into LACJ

4 Overt Act No. 357: From December 19, 2012, through January 22,  
5 2013, defendants CECILIA VIRGEN and JOSE FLORES, UICC-3, and UICC-23,  
6 arranged to smuggle approximately 64.6 grams of heroin and  
7 approximately 36.7 grams of methamphetamine into LACJ on behalf of  
8 DMM-1.

9 Overt Act No. 358: On January 19, 2013, at defendant CECILIA  
10 VIRGEN's direction, UICC-23 possessed and smuggled in his body at  
11 least 64.6 grams of heroin and 36.7 grams of methamphetamine into  
12 LACJ for DMM-1.

13 Overt Act No. 359: On January 22, 2013, UICC-23 gave an unknown  
14 amount of a controlled substance to UICC-3 in LACJ.

15 Smuggling of Methamphetamine, Heroin, and Marijuana into LACJ

16 Overt Act No. 360: From January 22, 2013, through February 28,  
17 2013, defendant RICHARD GRIEGO arranged with defendants CECILIA  
18 VIRGEN, VALERIE TREJO, and RICHARD BAILEY, for heroin,  
19 methamphetamine, and marijuana to be smuggled to UICC-3 in LACJ on  
20 behalf of DMM-1.

21 Overt Act No. 361: On February 28, 2013, defendant RICHARD  
22 GRIEGO possessed in his body and attempted to smuggle approximately  
23 26.2 grams of pure methamphetamine, approximately 62.9 grams of  
24 heroin, and approximately 11.75 grams of marijuana into LACJ for  
25 UICC-3 and DMM-1.

26 Smuggling of Methamphetamine into LACJ

27 Overt Act No. 362: From July 24, 2013, through August 14, 2013,  
28 defendant JONATHAN RODRIGUEZ arranged with defendants MARK LANDEROS,

1 KRISTEN AYALA, BRYANNA MCCULLAH, and JUAN NMN GARCIA, and UICC-31, to  
2 smuggle approximately one ounce of methamphetamine and one ounce of  
3 marijuana into LACJ.

4 Overt Act No. 363: On July 25, 2013, in a recorded telephone  
5 conversation, defendant KRISTEN AYALA advised UICC-31 on what to do  
6 when he arrived at LACJ with the smuggled drugs.

7 Overt Act No. 364: On August 3, 2013, in a recorded telephone  
8 conversation between defendants MARK LANDEROS, JUAN NMN GARCIA, and  
9 KRISTEN AYALA, defendant JUAN NMN GARCIA agreed to supply  
10 methamphetamine and marijuana for defendant MARK LANDEROS, and gave  
11 prices for the drugs.

12 Overt Act No. 365: On August 3, 2014, defendant JUAN NMN GARCIA  
13 provided approximately one ounce of methamphetamine to defendant  
14 KRISTEN AYALA so that the methamphetamine could be smuggled into LACJ  
15 on behalf of defendant MARK LANDEROS.

16 Overt Act No. 366: On August 3, 2014, unindicted co-conspirator  
17 KRISTEN AYALA obtained and packaged approximately one ounce of  
18 methamphetamine so that it could be smuggled into LACJ on behalf of  
19 defendant MARK LANDEROS.

20 Overt Act No. 367: From August 4, 2013, through August 12,  
21 2013, UICC-31 possessed approximately one ounce of methamphetamine  
22 for the purpose of smuggling it into LACJ on behalf of defendant MARK  
23 LANDEROS.

24 Overt Act No. 368: On August 13, 2013, defendant BRYANNA  
25 MCCULLAH possessed approximately one ounce of methamphetamine and  
26 gave that methamphetamine to defendant JONATHAN RODRIGUEZ, with the  
27 intent that it be smuggled into LACJ on behalf of defendant MARK  
28 LANDEROS.



1       Overt Act No. 369: On August 13, 2013, in a recorded telephone  
2 conversation, defendant JONATHAN RODRIGUEZ agreed with defendant MARK  
3 LANDEROS to smuggle drugs into LACJ.

4       Overt Act No. 370: On August 14, 2013, defendant JONATHAN  
5 RODRIGUEZ possessed approximately 22.7 grams of methamphetamine in in  
6 his body which was discovered and seized by LASD deputies.

7       Smuggling of Methamphetamine and Marijuana into LACJ via Kidney  
8       Dialysis Center

9       Overt Act No. 371: On September 21, 2013, defendant JONATHAN  
10 MENDEZ attempted to smuggle approximately 51.29 grams of marijuana  
11 and 13.2 grams of methamphetamine that had been left in a kidney  
12 dialysis center by an unknown co-conspirator.

13       Possession of Heroin Within LACJ and Extortion

14       Overt Act No. 372: On or before December 18, 2013, defendant  
15 JONATHAN RODRIGUEZ agreed to smuggle approximately 43.7 grams of  
16 heroin inside Twin Towers for UICC-2 and defendant LUIS GARCIA.

17       Overt Act No. 373: On December 18, 2013, in Twin Towers,  
18 defendant JONATHAN RODRIGUEZ, intending to distribute the drugs to  
19 others on behalf of defendant JOSE LANDA-RODRIGUEZ, possessed  
20 approximately 43.7 grams of heroin which was discovered and seized by  
21 LASD deputies.

22       Smuggling of Drugs in LACJ

23       Overt Act No. 374: Between April 18, 2014, and April 20, 2014,  
24 defendant FRANK HERRERA, on behalf of defendants DONATO GONZALEZ and  
25 ALVARO RUIZ, obtained methamphetamine and heroin for the purpose of  
26 having it smuggled into LACJ.

27       Overt Act No. 375: From April 20, 2014, through April 22, 2014,  
28 an defendant RAMON AMAYA smuggled approximately 2.37 grams of heroin

1 and 7.75 grams of methamphetamine into LACJ inside his body, with the  
2 intent to distribute the drugs within LACJ.

3 Overt Act No. 376: On April 22, 2014, defendant MARTIN SALAZAR  
4 possessed approximately 2.37 grams of heroin and 7.75 grams of  
5 methamphetamine that had been smuggled into LACJ by defendant RAMON  
6 AMAYA in order to secrete the drugs from LASD deputies and to further  
7 distribute the drugs within LACJ.

8 Smuggling of Heroin into LACJ

9 Overt Act No. 377: On or before October 22, 2014, defendant  
10 MARCO MEZA agreed with defendant MIGUEL RODRIGUEZ to smuggle heroin  
11 into LACJ.

12 Overt Act No. 378: On October 22, 2014, at the direction of  
13 defendant MIGUEL RODRIGUEZ, defendant MARCO MEZA smuggled  
14 approximately 18.82 grams of heroin into LACJ on behalf of defendant  
15 JOSE LANDA-RODRIGUEZ.

16 Overt Act No. 379: On October 22, 2014, defendant MARCO MEZA  
17 called defendant MIGUEL RODRIGUEZ to report that he had arrived at  
18 LACJ with the heroin he had smuggled in.

19 Smuggling of Methamphetamine and Heroin into LACJ

20 Overt Act No. 380: On August 19, 2015, in a recorded telephone  
21 conversation, defendant ROBERT RAMIREZ discussed smuggling drugs into  
22 LACJ with defendants ALVINO MUNOZ and KELLY JO BELL.

23 Overt Act No. 381: On September 1, 2015, in a recorded  
24 telephone conversation, defendant ROBERT RAMIREZ spoke to an  
25 unidentified unindicted co-conspirator who told defendant ROBERT  
26 RAMIREZ that defendant ALEJANDRO MARTINEZ had the drugs to be  
27 smuggled into LACJ for defendant JOSE LANDA-RODRIGUEZ.

28 ///

1       Overt Act No. 382: On September 1, 2015, in a recorded  
2 telephone conversation, defendant ROBERT RAMIREZ told defendant KELLY  
3 JO`BELL that he got the message about defendant ALEJANDRO MARTINEZ  
4 smuggling drugs into LACJ, that he located defendant ALEJANDRO  
5 MARTINEZ right away, and that he would keep defendant KELLY JO BELL  
6 updated as to the status of the drugs.

7       Overt Act No. 383: On September 1, 2015, defendant ALEJANDRO  
8 MARTINEZ, having smuggled drugs into LACJ, possessed, inside his  
9 body, approximately 41.8 grams of methamphetamine and 61.83 grams of  
10 heroin, which was discovered and seized by LASD deputies.

COUNT SEVEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about May 13, 2013, in Los Angeles County, within the Central District of California, defendant MICHAEL BENNETT, also known as "Irish," knowingly and intentionally possessed with intent to distribute at least five grams, that is, approximately 5.5 grams, of methamphetamine, a Schedule II controlled substance.

COUNT EIGHT

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2]

On or about August 14, 2014, in Los Angeles County, within the Central District of California, defendant JONATHAN RODRIGUEZ, also known as ("aka") "Sharkie," knowingly and intentionally possessed with intent to distribute at least five grams, that is, approximately 22.7 grams, of methamphetamine, a Schedule II controlled substance.

At the above time and place, defendants MARK LANDEROS, aka "Smokey," aka "Troy," aka "Hot," KRISTEN AYALA, JUAN NMN GARCIA, aka "Trouble," and BRYANNA MCCULLAH, aka "Bee Bee," knowingly and intentionally aided, abetted, counseled, commanded, induced and procured, and willfully caused, the commission of the offense alleged above.

COUNT NINE

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about September 21, 2013, in Los Angeles County, within the Central District of California, defendant JONATHAN MENDEZ, also known as ("aka") "Casper," aka "Smokes," knowingly and intentionally possessed with intent to distribute at least five grams, that is, approximately 13.2 grams, of methamphetamine, a Schedule II controlled substance.

COUNT TEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(D)]

On or about September 21, 2013, in Los Angeles County, within the Central District of California, defendant JONATHAN MENDEZ, also known as ("aka") "Casper," aka "Smokes," knowingly and intentionally possessed with intent to distribute approximately 51.29 grams of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.



COUNT ELEVEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about December 18, 2013, in Los Angeles County, within the Central District of California, defendant JONATHAN RODRIGUEZ, also known as "Sharkie," knowingly and intentionally possessed with intent to distribute approximately 43.7 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

COUNT TWELVE

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2]

On or about April 22, 2014, in Los Angeles County, within the Central District of California, defendants MARTIN SALAZAR, also known as ("aka") "Sweeper," and RAMON AMAYA, aka "Lil Happy," knowingly and intentionally possessed with intent to distribute at least five grams, that is, approximately 7.75 grams, of methamphetamine, a Schedule II controlled substance.

At the above time and place, defendants GABRIEL ZENDEJAS-CHAVEZ, aka "Corbatas," DONATO GONZALEZ, aka "Nato," aka Nasty," aka "Debo," aka "Ray," ALVARO RUIZ, aka "Roach," and FRANK HERRERA, aka "Dopey," aka "Ben," knowingly and intentionally aided, abetted, counseled, commanded, induced and procured, and willfully caused, the commission of the offense alleged above.

COUNT THIRTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2]

On or about April 22, 2014, in Los Angeles County, within the Central District of California, defendants MARTIN SALAZAR, also known as ("aka") "Sweeper," and RAMON AMAYA, aka "Lil Happy," knowingly and intentionally possessed with intent to distribute approximately 2.37 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

At the above time and place, defendants GABRIEL ZENDEJAS-CHAVEZ, aka "Corbatas," DONATO GONZALEZ, aka "Nato," aka Nasty," aka "Debo," aka "Ray," ALVARO RUIZ, aka "Roach," and FRANK HERRERA, aka "Dopey," aka "Ben," knowingly and intentionally aided, abetted, counseled, commanded, induced and procured, and willfully caused, the commission of the offense alleged above.

COUNT FOURTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

On or about April 30, 2014, in Los Angeles County, within the Central District of California, defendants GERARDO TAPIA, also known as ("aka") "Jerry," and DIANA MARTINEZ, aka "Devine," each aiding and abetting each other, knowingly and intentionally possessed with intent to distribute at least 500 grams, that is, approximately 1,746 grams, of methamphetamine, a Schedule II controlled substance.

COUNT FIFTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

On or about May 9, 2014, in Los Angeles County, within the Central District of California, defendant GERARDO TAPIA, also known as "Jerry," knowingly and intentionally possessed with intent to distribute at least 500 grams, that is, approximately 558.6 grams, of methamphetamine, a Schedule II controlled substance.

COUNT SIXTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

On or about October 22, 2014, in Los Angeles County, within the Central District of California, defendant MARCO MEZA, also known as ("aka") "Green Eyes," aka "Ojos," knowingly and intentionally possessed with intent to distribute approximately 18.82 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

At the above time and place, defendant MIGUEL RODRIGUEZ, aka "Rebel," aka "Pee Wee," aka "R," knowingly and intentionally aided, abetted, counseled, commanded, induced and procured, and willfully caused, the commission of the offense alleged above.

COUNT SEVENTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

On or about October 24, 2014, in Los Angeles County, within the Central District of California, defendant ERNESTO VARGAS, also known as ("aka") "Huero," aka "Huero Caballero," aka "Paisa Huero," knowingly and intentionally possessed with intent to distribute at least 50 grams, that is, approximately 601.2 grams, of methamphetamine, a Schedule II controlled substance.



COUNT EIGHTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(i)]

On or about October 24, 2014, in Los Angeles County, within the Central District of California, defendant ERNESTO VARGAS, also known as ("aka") "Huero," aka "Huero Caballero," aka "Paisa Huero," knowingly and intentionally possessed with intent to distribute at least 100 grams, that is, approximately 501.3 grams, of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

COUNT NINETEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about October 24, 2014, in Los Angeles County, within the Central District of California, defendant ERNESTO VARGAS, also known as ("aka") "Huero," aka "Huero Caballero," aka "Paisa Huero," knowingly and intentionally possessed with intent to distribute approximately 1.4 grams of a mixture and substance containing a detectable amount of cocaine base in the form of crack cocaine, a Schedule II narcotic drug controlled substance.

COUNT TWENTY

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about October 24, 2014, in Los Angeles County, within the Central District of California, defendant ERNESTO VARGAS, also known as ("aka") "Huero," aka "Huero Caballero," aka "Paisa Huero," knowingly and intentionally possessed with intent to distribute approximately 83.4 grams of cocaine, a Schedule II narcotic drug controlled substance.

COUNT TWENTY-ONE

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2]

On or about September 1, 2015, in Los Angeles County, within the Central District of California, defendant ALEJANDRO MARTINEZ, also known as ("aka") "Smokey," knowingly and intentionally possessed with intent to distribute at least five grams, that is, approximately 41.8 grams, of methamphetamine, a Schedule II controlled substance.

At the above time and place, defendants ALVINO MUNOZ, aka "Bino," aka "B," KELLY JO BELL, and ROBERT RAMIREZ, aka "Wiz," knowingly and intentionally aided, abetted, counseled, commanded, induced and procured, and willfully caused, the commission of the offense alleged above.

COUNT TWENTY-TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about September 1, 2015, in Los Angeles County, within the Central District of California, defendant ALEJANDRO MARTINEZ, also known as ("aka") "Smokey," knowingly and intentionally possessed with intent to distribute approximately 61.83 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

At the above time and place, defendants ALVINO MUNOZ, aka "Bino," aka "B," KELLY JO BELL, and ROBERT RAMIREZ, aka "Wiz," knowingly and intentionally aided, abetted, counseled, commanded, induced and procured, and willfully caused, the commission of the offense alleged above.

COUNT TWENTY-THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about October 14, 2015, in Los Angeles County, within the Central District of California, defendant KELLY JO BELL knowingly and intentionally possessed with intent to distribute at least five grams, that is, approximately 12.0 grams, of methamphetamine, a Schedule II controlled substance.

COUNT TWENTY-FOUR

[18 U.S.C. §§ 1956(a)(1)(A)(i), 2(b)]

On or about May 9 and May 10, 2013, in Los Angeles County, within the Central District of California, and elsewhere, defendant DANIEL CERVANTES, also known as ("aka") "Maniac," aka "J," aka "Paisa Jose," knowing that the property involved in the financial transaction described below represented the proceeds of some form of unlawful activity, conducted and willfully caused others to conduct a financial transaction affecting interstate and foreign commerce, namely, the exchange of \$7,976 worth of money orders for \$7,178 in cash, which transaction, in fact, involved the proceeds of specified unlawful activity, that is, Extortion, in violation of California Penal Code Sections 21(a), 31, 182, 518, 519, 524, and 664, and Conspiracy to Distribute Controlled Substances, in violation of Title 21, United States Code, Section 846, with the intent to promote the carrying on of such specified unlawful activity.



COUNT TWENTY-FIVE

[18 U.S.C. §§ 1956(a)(1)(A)(i), 2(b)]

On or about May 25, 2013, in Los Angeles County, within the Central District of California, and elsewhere, defendant ANA MARTINEZ, also known as ("aka") "Ana America," aka "Bandit," knowing that the property involved represented the proceeds of some form of unlawful activity, conducted and willfully caused others to conduct a financial transaction affecting interstate and foreign commerce, namely, the conversion to cash of \$500 of money orders, representing the proceeds of extortion and a conspiracy to distribute controlled substances, which transaction, in fact, involved the proceeds of specified unlawful activity, that is, Extortion, in violation of California Penal Code Sections 21(a), 31, 182, 518, 519, 524, and 664, and Conspiracy to Distribute Controlled Substances, in violation of Title 21, United States Code, Section 846, with the intent to promote the carrying on of such specified unlawful activity.

COUNT TWENTY-SIX

[18 U.S.C. § 1029(a)(3)]

On or about August 7, 2013, in Los Angeles County, within the Central District of California, defendant ANA MARTINEZ, also known as ("aka") "Ana America," aka "Bandit" ("ANA MARTINEZ"), knowingly and with intent to defraud, possessed at least fifteen unauthorized access devices (as defined in Title 18, United States Code, Sections 1029(e)(1) and (3)), namely, approximately 725 social security numbers belonging to persons other than defendant ANA MARTINEZ, along with dates of birth and names of persons other than defendant ANA MARTINEZ, with said possession affecting interstate and foreign commerce.

COUNT TWENTY-SEVEN

[18 U.S.C. § 1028A(a)(1)]

On or about August 7, 2013, in Los Angeles County, within the Central District of California, defendant ANA MARTINEZ, also known as ("aka") "Ana America," aka "Bandit", ("ANA MARTINEZ") knowingly possessed, without legal authority, means of identification that defendant ANA MARTINEZ knew belonged to another person, that is, a social security number and date of birth belonging to M.V., during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(3), Possession of at least Fifteen Unauthorized Access Devices, as charged in Count Twenty-Six of this Indictment.

COUNT TWENTY-EIGHT

[18 U.S.C. § 924(c)(1)(A)]

On or about October 24, 2014, in Los Angeles County, within the Central District of California, defendant ERNESTO VARGAS knowingly used and carried a firearm, namely, a Kimber model Custom 2 .45 caliber semi-automatic pistol, bearing serial number K319556, during and in relation to, and possessed that firearm in furtherance of, a crime of violence, namely, Racketeering Conspiracy, in violation of Title 18, United States Code, Section 1962(d), as charged in Count One of this Indictment, and drug trafficking crimes, namely, Conspiracy to Distribute Controlled Substances, in violation of Title 21, United States Code, Section 846, as charged in Count Six of this Indictment, and Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Counts Seventeen, Eighteen, Nineteen, and Twenty of this Indictment.

COUNT TWENTY-NINE

[18 U.S.C. § 922(g)(1)]

On or about October 24, 2014, in Los Angeles County, within the Central District of California, defendant ERNESTO VARGAS, also known as ("aka") "Huero," aka "Huero Caballero," aka "Paisa Huero" ("VARGAS"), knowingly possessed a firearm, namely, a Kimber model Custom 2 .45 semi-automatic pistol, bearing serial number K319556, and ammunition, namely, seven rounds of Remington .45 caliber ammunition, in and affecting interstate and foreign commerce.

Such possession occurred after defendant VARGAS had been convicted of at least one of the following felony crimes, each punishable by a term of imprisonment exceeding one year:

(1) Manufacture of a Controlled Substance, in violation of California Health and Safety Code Section 11379.6, in the Superior Court of the State of California, County of Los Angeles, case number NA048204, on or about April 4, 2001;

(2) Sale of a Controlled Substance, in violation of California Health and Safety Code Section 11379, in the Superior Court of the State of California, case number BA250764, on or about April 15, 2004.

FORFEITURE ALLEGATION ONE

[18 U.S.C. § 1963]

5. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963, in the event of any defendant's conviction under Count One of this Indictment.

6. Defendants shall forfeit to the United States the following property:

a. All right, title, and interest in:

i. any and all interest including, without limitation, any and all interest in any and all property (real, personal, tangible, intangible or otherwise) any person acquired or maintained in violation of Title 18, United States Code, Section 1962;

ii. any and all interest in, security of, claims against, or property or contractual right of any kind affording a source of influence over, any enterprise which any person established, operated, controlled, conducted or participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and

iii. any and all property (real, personal, tangible, intangible or otherwise) constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of Title 18, United States Code, Section 1962; and

b. A sum of money equal to the total value of the property described in subsection a. If more than one defendant is

1 found guilty under Count One each such defendant shall be jointly and  
2 severally liable for the entire amount forfeitable pursuant to that  
3 Count.

4 7. Pursuant to Title 18, United States Code, Section 1963(m),  
5 each defendant shall forfeit substitute property, up to the value of  
6 the money and property described in the preceding paragraph, if, as  
7 the result of any act or omission of a defendant, the property  
8 described in the preceding paragraph, or any portion thereof (a)  
9 cannot be located upon the exercise of due diligence; (b) has been  
10 transferred, sold to, or deposited with a third party; (c) has been  
11 placed beyond the jurisdiction of the court; (d) has been  
12 substantially diminished in value; or (e) has been commingled with  
13 other property that cannot be divided without difficulty.



## FORFEITURE ALLEGATION TWO

[21 U.S.C. § 853]

1. The allegations contained in the general allegations and in Counts One and Six of this Indictment are hereby repeated, re-alleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 21, United States Code, Section 853, in the event of any defendant's conviction under any of Counts Six through Twenty-Three of this Indictment.

2. Each defendant convicted under any of Counts Six through Twenty-Three shall forfeit to the United States any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation and any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.

3. Pursuant to Title 21, United States Code, Section 853(p), each defendant shall forfeit substitute property, up to the value of the total amount described in paragraph 2, if, as the result of any act or omission of said defendant, the property described in paragraph 2, or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty.

FORFEITURE ALLEGATION THREE

[18 U.S.C. § 924(d); 28 U.S.C. § 2461]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18 United States Code, Section 924(d), of any defendant's conviction under any of Counts Twenty-Eight through Twenty-Nine of this Indictment.

2. Such defendants shall forfeit to the United States all firearms and ammunition involved in the commission of each such offense, including all firearms and ammunition in this Indictment.

A TRUE BILL

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Foreperson

NICOLA T. HANNA  
United States Attorney



LAWRENCE S. MIDDLETON  
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